

## **EXHIBIT 86**

**Subject:** Чат: romanlavlinskiy  
**From:** romanlavlinskiy <romanlavlinskiy@gmail.com>  
**Date:** 11/23/2012 4:12 AM  
**To:** veesodef@gmail.com

romanlavlinskiy: отправил  
romanlavlinskiy: будет нужен код-скажи  
я: Ром, давай код  
romanlavlinskiy: меняю на пин  
я: ■■■■28  
я: стоп  
я: ■■■■25  
romanlavlinskiy: ■■■■7134  
я: once more please  
romanlavlinskiy: ■■■■6048  
я: ты уверен что пин правильно вводишь?  
я: давай еще раз  
romanlavlinskiy: ■■■■069  
я: меня не пускает  
romanlavlinskiy: что говорит?  
я: Account Management Login

failed  
romanlavlinskiy: у меня так тоже было  
romanlavlinskiy: раза с 4 вошел  
romanlavlinskiy: у них система глючит  
я: ну давай ысчо  
romanlavlinskiy: ■■■■518  
я: хуй

romanlavlinskiy: а кабинет грузить начинает?  
я: нет  
romanlavlinskiy: хммм

romanlavlinskiy: ты точно не на мой счет входишь?

я: может ты че с пином не так делаешь, хз

я: точно

romanlavlinskiy: а че с ним можно не так сделать?

я: пароль пропускает

romanlavlinskiy: вбил пин, нажал ок

romanlavlinskiy: пин ■■■■828

romanlavlinskiy: получил код

я: хз, не знаю. может ты медленно делаешь, там 30 секунд код действителен

я: пин я ж написал ■■■■825

romanlavlinskiy: ну давай ща ты пароль и логин вобъешь и дашь мне отмашку

я: потом исправил

я: пин [REDACTED]25

romanlavlinskiy: ааа, ну все ясно

romanlavlinskiy: я не тот пин вводил

я: ок, 5 сек

romanlavlinskiy: пробуем еще раз

я: ща скажу

я: давай

romanlavlinskiy: [REDACTED]648

я: ,kz

я: бля

я: опятьэ

я: давай еще

я: 6825

romanlavlinskiy: [REDACTED]5076

я: похоже сработало

romanlavlinskiy: уррааа

я: там bank wire нам нужен?

romanlavlinskiy: да

я: из лично моих реквизитов там нужен только bank account number&

я: ?

romanlavlinskiy: да

romanlavlinskiy: все остальное либо я написал либо у них автоматически определиться

я: я тебе скрин прислал, проверь плиз

romanlavlinskiy: вроде да

я: swift без пробелов

я: ?

romanlavlinskiy: да

я: кроме сфифта в поле swift/bic ты больше ниче не писал?

romanlavlinskiy: не писал

я: проверь следующ

romanlavlinskiy: да

я: 360 ?

romanlavlinskiy: ну вроде столько же насчитали

я: да

я: я на всякий

romanlavlinskiy: да

я: ,kz

я: fuck

romanlavlinskiy: что такое

romanlavlinskiy: Саня, нехорошо сказать пиздец и потом молчать

я: давай код, все хорошо

romanlavlinskiy: [REDACTED]7179

я: все ок

я: в 14-00 встречаемся?

я: точнее 13-50

Чат: romanlavlinskiy

я: ага?

я: а у тебя тоже написано было новосибирская область в банк локейшион?

romanlavlinskiy: да, по обоим вопросам

## **EXHIBIT 87**

**Subject:**

**From:** Роман Лавлинский <romanlavlinskiy@gmail.com>  
**Date:** 1/29/2013 1:27 PM  
**To:** Alexander Fedoseev <veesodef@gmail.com>

— скрин утв.PNG

Show trades <input type="checkbox"/> Sun <input type="checkbox"/> Mon <input checked="" type="checkbox"/> Tue <input type="checkbox"/> Wed <input type="checkbox"/> Thu <input type="checkbox"/> Fri <input type="checkbox"/> Sat <input type="checkbox"/> All										<input type="text" value="Enter symbol filter"/>	
Trades	Summary	Contract	Buys	Sells	Net	Avg (BOT)	Avg (SLD)	Total (BOT)	Total (SLD)	Net Total	Commission
		TOTAL USD	17,920	18,210	-290			562,996.80	623,920.38	60,923.58	171.74
		VMW FEB13 97.5 Put Option	20	10	10	19.200	3.550	38,400.00	3,550.00	-34,850.00	3.11

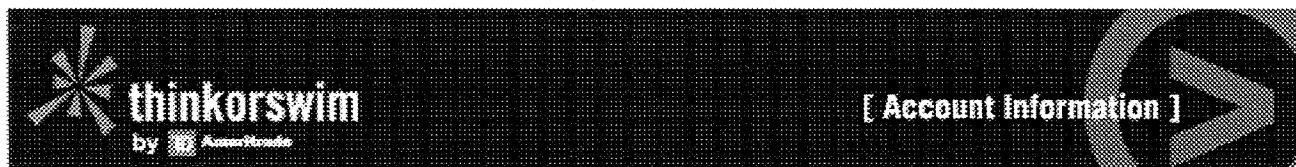
— Attachments:

скрин vmw.PNG

24.5 KB

## **EXHIBIT 88**

**From:** account@thinkorswim.com  
**Sent:** Thursday, October 14, 2010 10:34 PM  
**To:** romanlavlinskiy@gmail.com  
**Subject:** thinkorswim Portfolio Margining



Hello Roman Lavlinskiy-

Congratulations! After reviewing your account and your paperwork we have approved account \*\*\*\*3933 for Portfolio Margining. At the start of tomorrow's bell you will see the new margin method being computed for stock and option positions in your account. To let you know, if your account falls below \$100,000 you will have two days to bring this above \$100,000 or your account will be removed from the system.

If you would like to review the principles and requirements for portfolio margining please click on the thinkorswim webpage below.

<http://www.thinkorswim.com/tos/displayPage.tos?webpage=portfolioMargin>

Thank you for your continued business with thinkorswim, Inc.

Best Regards,

Don

Don Roberts  
Managing Director

866 839 1100 ext 3216  
773 435 3216 direct  
312 212 5862 fax

thinkorswim, inc.  
600 west chicago avenue, suite #100  
chicago, IL 60654-2597

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This e-mail is sent by a financial firm and contains information that may be privileged and confidential.  
If you are not the intended recipient, please delete the e-mail and notify us immediately.

(sent to Roman Lavlinskiy at [romanlavlinskiy@gmail.com](mailto:romanlavlinskiy@gmail.com))

[www.thinkorswim.com](http://www.thinkorswim.com)

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This e-mail is sent by a financial firm and contains information that may be privileged and confidential.  
If you are not the intended recipient, please delete the e-mail and notify us immediately.

The risk of loss in trading securities, options, futures and forex can be substantial. Clients must consider all relevant risk factors, including their own personal financial situation, before trading. Options involve risk and are not suitable for all investors. See the Options Disclosure Document: [Characteristics and Risks of Standardized Options](#). A copy can be requested via email at [support@thinkorswim.com](mailto:support@thinkorswim.com) or via mail to 600 W. Chicago Ave., #100, Chicago, IL 60654-2597. Trading foreign exchange on margin carries a high level of risk, as well as its own unique risk factors. Forex investments are subject to counter-party risk, as there is no central clearing organization for these transactions. Please read the [Forex Risk Disclosure](#) before considering the trading of this product. A forex dealer can be compensated via commission and/or spread on forex trades. TD AMERITRADE is subsequently compensated by the forex dealer. Futures and forex accounts are not protected by the Securities Investor Protection Corporation (SIPC). Supporting documentation for any claims, comparisons, recommendations, statistics, or other technical data, will be supplied upon request.

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## **EXHIBIT 89**



**Penson Financial Services, Inc.**  
**New Account Form - Portfolio Margin Account (NAF-PM)**

Office Code: 00 RR# 00

Account Number: 3933 Account Approval Date: 12/24/09

Is this account for a Foreign Bank?

Yes /  No. If yes, please list U.S. agent for service of process:

Name of Primary Account Holder or Title of Account: Roman Lavinsky  
 (Write name exactly as it appears on Social Security Card or Fed ID Registration)

**Primary Account Holder Information:**

SSN, Fed ID, Cedula, NIT#:	<u>32467</u>	Client Home Phone:	
Driver's License Number:	<u>Passport</u>	Date of Birth:	<u>1985</u>
Physical Address (No P.O. Boxes):	<u>Svobody Str., 16-26</u>	Marital Status:	<u>Single</u>
City, State, Zip:	<u>Voronezh 394018</u>	Country:	<u>Russia</u>
Mailing Address (if different):			
City, State, Zip: Country:			
Employer's Name:	<u>Self Employed</u>	Occupation:	
Employer's Address:			
City, State, Zip:			
Email Address:			
Associated person of a Broker?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No (If Yes, please name):		

Name of Secondary Account Holder (if Applicable):  
 (Write name exactly as it appears on Social Security Card or Fed ID Registration)

**Secondary Account Holder Information:**

Relationship to Primary Account Holder:			
SSN, Fed ID, Cedula, NIT#:			Client Home Phone:
Driver's License Number:			Date of Birth:
Physical Address (No P.O. Boxes):			
City, State, Zip:			Country:
Mailing Address (if different):			
City, State, Zip: Country:			Country:
Employer's Name:			Occupation:
Employer's Address:			Employer's Phone:
City, State, Zip:			Country:
Email Address:			
Associated person of a Broker?	<input type="checkbox"/> Yes / <input type="checkbox"/> No (If Yes, please name):		

**Client Information:**

**Primary:**

Are you a U.S. Citizen?  Yes /  No

Resident Alien?  Yes /  No Country of Birth: \_\_\_\_\_

Non-Resident Alien?  Yes /  No Country of Residence: Russia

**Secondary:**

Are you a U.S. Citizen?  Yes /  No

Resident Alien?  Yes /  No Country of Birth: \_\_\_\_\_

Non-Resident Alien?  Yes /  No Country of Residence: \_\_\_\_\_

PL



How long has the Account Holder known the Broker?	Self directed trader
Who introduced the Account Holder and Broker?	
Is account holder a control person? (Officer, Director or 10% stock owner)	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
If Yes, Please list the company(s) controlled & position:	
Is client an employee of Insurance Co., Bank, Fund, Securities firm or Investment Advisor?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
If Yes, Please list the company name, address and phone number, and position held:	

<b>Investment Objectives:</b> (* If more than one, please rank 1-8)		<b>Tax Information:</b>
<input checked="" type="checkbox"/> Long term growth with safety (long term capital appreciation with relative safety of principal) A <input type="checkbox"/> Short term growth with high risk (Appreciation with acceptance of high risk) B <input checked="" type="checkbox"/> Speculative (want increase in value of investments - High Risk) C <input checked="" type="checkbox"/> Income (want to use proceeds of the acct. as a source of income) H <input type="checkbox"/> Growth and Income (preserve capital as much as possible) I <input type="checkbox"/> Long term growth with greater risk Aggressive Growth (trade volatile securities that have wide changes in price) J <input type="checkbox"/> Balanced (Diversification of asset classes for equal blend of income and long-term growth) M <input type="checkbox"/> Capital Appreciation (High Risk, capital growth invested primarily in stocks and options) N		# Of Dependents 0 Tax Bracket 20% Initial Deposit \$238,200 % Initial Transaction \$ — Source of Funds Wire

Income:	Net Worth:	Liquid Net Worth:	Payment Instructions:
<input type="checkbox"/> \$0 - \$24,999 <input type="checkbox"/> \$25,000 - \$39,999 <input type="checkbox"/> \$40,000 - \$64,999 <input type="checkbox"/> \$65,000 - \$124,999 <input checked="" type="checkbox"/> \$125,000 - \$249,999 <input type="checkbox"/> \$250,000 - \$499,999 <input type="checkbox"/> \$500,000 - \$999,999 <input type="checkbox"/> \$1,000,000 - Over	<input type="checkbox"/> \$0 - 25,000 <input type="checkbox"/> \$25,000 - 39,999 <input type="checkbox"/> \$40,000 - 64,999 <input type="checkbox"/> \$65,000 - 124,999 <input type="checkbox"/> \$125,000 - 249,999 <input type="checkbox"/> \$250,000 - \$499,999 <input type="checkbox"/> \$500,000 - \$999,999 <input checked="" type="checkbox"/> \$1,000,000 - Over	<input type="checkbox"/> \$0 - 25,000 A <input type="checkbox"/> \$25,000 - 39,999 B <input type="checkbox"/> \$40,000 - 64,999 C <input type="checkbox"/> \$65,000 - 124,999 D <input type="checkbox"/> \$125,000 - 249,999 E <input type="checkbox"/> \$250,000 - \$499,999 F <input type="checkbox"/> \$500,000 - \$999,999 G <input type="checkbox"/> \$1,000,000 - Over H	<b>Securities:</b> <input type="checkbox"/> Transfer & Ship (1) <input type="checkbox"/> Hold St. Name (2) <b>Money:</b> <input type="checkbox"/> Pay (1) <input type="checkbox"/> Hold (7) <b>Dividends:</b> <input type="checkbox"/> Pay Weekly (1) <input type="checkbox"/> Pay Monthly (1) <input type="checkbox"/> Hold (4) <b>Principal &amp; Maturity:</b> <input type="checkbox"/> Credit to Account <b>Process checks:</b> <input type="checkbox"/> Monthly <input type="checkbox"/> Weekly <b>Money Market Sweeps:</b> <input type="checkbox"/> Yes / <input type="checkbox"/> No - If Yes, List Fund:

Investment Experience:	Years of Experience:	Average Dollar Amount:	Number of transactions per year:
Futures:	6	\$	51-100
Options:	6	\$	51-100
Stocks:	6	\$	101-200
Bonds:	5	\$	1-10
Commodities:		\$	
Other (Specify):		\$	

Previous Options Experience (Years)		
STRATEGY	STOCK OPTIONS	INDEX OPTIONS
Buying (Includes Debit Spreads & Straddles):	6	6
Covered Writing:	6	6
Spreads:	6	6
Uncovered Writing:	6	6

If this is an entity account (i.e. corporations, partnerships, limited liability corporations, trusts), answer the following questions:

Is this account for a foreign shell bank?  Yes /  No

Does this entity offer services to a foreign shell bank?  Yes /  No

\* If this account is for a foreign bank or 'Yes' was answered to either of the last two questions, the entity must complete the Certification Regarding Correspondent Accounts.



Account #

3933

**Type of Registration:**

<input checked="" type="checkbox"/>	Accredited Investor
<input type="checkbox"/>	Corporate Account
<input type="checkbox"/>	Partnership
<input type="checkbox"/>	Limited Liability Corporation
<input type="checkbox"/>	Trust

**Duplicate Confirmations:**

Please send Duplicate confirms to the following address:

N/A

**Authorized Person:**

If a person, other than the primary and/or secondary account holder will be operating this account, list Name, Address, ID# & Employer:

Is this a Discretionary account?  Yes /  No

**BROKER USE ONLY:****Day Trading:**

Approved for Day Trading Strategy?	<input type="checkbox"/> Yes / <input checked="" type="checkbox"/> No
Day Trading Risk Disclosure Statement Delivered?	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
Date Day Trading Disclosure was Delivered:	12/21/09

**Option Trading Approvals:**

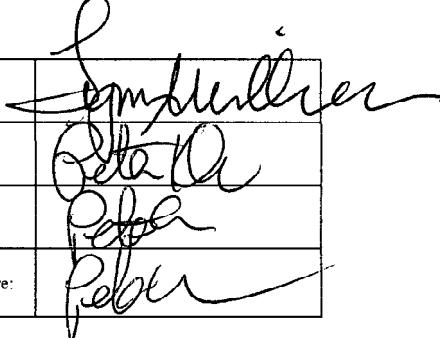
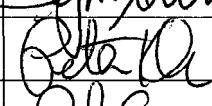
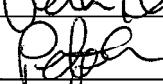
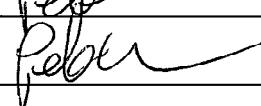
Covered Call Writing:	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
Purchasing Options: (Puts for Safety or Leverage / Call for Leverage)	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
Uncovered Option Writing:	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No
Other Options Transactions:	<input checked="" type="checkbox"/> Yes / <input type="checkbox"/> No

**Document Deliveries:**

Please note date of delivery for the following:

Privacy Policy:	12/21/09
Margin Risk Disclosure Statement:	12/21/09
Characteristics of Risks of Standard Options:	12/21/09
Special Statement for Uncovered Option Writers:	12/6/09
Portfolio Margin Risk Disclosure Statement:	1/12/09

**Signatures:**

Registered Rep Signature:	
Branch Manager Signature:	
Designated Officer Signature:	
Registered Option Principal Signature:	



## Portfolio Margin Test

1. Do you keep track of account information online?

2. Do you know that Pearson's policy requires portfolio margin calls be met the day immediately following the day of the call issuance?

 Yes

 No

 Not applicable

3. You establish the following position:

- Long 1,000 OEX JUN 640 Calls @ \$21.00
- Long 1,000 OEX JUN 640 Puts @ \$10.76

What is the traditional margin requirement?

- a. \$3,176,000
- b. \$1,368,000
- c. \$1,024,000
- d. \$117,600

e. None of the above.

4. You establish the following position:

- Short 1 ABC 50 Put @ \$2.25

If the price of ABC is \$40 at expiration, what is the profit or loss from this short put position?

- a. \$750 Profit
- b. \$750 Loss
- c. \$775 Profit
- d. \$775 Loss
- e. \$1,000 Loss

5. Which of the following is NOT permitted when no account is restricted to "Liquidation Orders Only"?

- a. Depositing additional funds or securities to the account
- b. Placing an order to open an naked position
- c. Buying to close an uncovered position
- d. Selling to close a long position
- e. None of the above is permitted

6. You have opened several accounts with XYZ Broker. Which of the following is an account under identical ownership as your individual portfolio margin account?

- a. Your Roth Individual Retirement Account
- b. Your Individual Margin Account
- c. Your Joint With Rights Of Survivorship Account
- d. Your Corporate Account
- e. Your 401k Account

7. You have already been approved for covered call writing but must be re-approved for which of the following in order to participate in portfolio margining?

- a. Purchasing Straddles
- b. Purchasing Spreads
- c. Purchasing Options
- d. Short-selling
- e. Selling Uncovered Options

8. The following positions belong in the same "security class" or "product group" as a long position in MSFT, EXCEPT

- a. Short puts with the obligation to purchase MSFT shares
- b. Short calls with the obligation to sell MSFT shares
- c. Long position in the QQQQ, tracking the NASDAQ 100 Index, of which MSFT is a major component
- d. Long LEAPS options on MSFT
- e. Long position in MSFT preferred shares

9. All LEAPS

- a. are unlisted derivatives of equity indices
- b. are options on commodities and futures contracts
- c. are issued with longer life than standard options
- d. are options on Exchange Traded Funds
- e. are options on individual stocks

10. Which of the following is a synthetic long put?

- a. Long stock, short put
- b. Long stock, short call
- c. Long stock, long put
- d. Short stock, long put
- e. Short stock, long call

Client Initials: Lavinskaya

Date: 28.01.2010

11. To hedge a long position in IBM, a customer can do all of the following EXCEPT

- a. Buy to open in the money IBM puts
- b. Buy to open in the money IBM puts
- c. Sell to open out-of-the-money IBM calls
- d. Sell to open in the money IBM puts
- e. All of the above

12. A customer establishes the following position:

- Short 1,000 IBM 100 Call

- Short 1,000 IBM 100 Put

If the price of IBM is \$100 at expiration, what is the resulting IBM position in the customer's account on the business day following the expiration?

- a. Flat or no position in IBM
- b. Long 100,000 shares in IBM
- c. Short 100,000 shares in IBM
- d. Both (b) and (c)
- e. Unable to determine

13. A call writer hoping to benefit from the time decay of the option premium would use which of the following measures?

- a. Theta, expressed in percentage
- b. Theta, expressed in dollars
- c. Delta, expressed in percentage
- d. Delta, expressed in dollars
- e. Gamma, expressed in percentage

14. Which of the following measures the change in an option value given one percent change in the volatility?

- a. Delta
- b. Gamma
- c. Theta
- d. Vega
- e. Rho

15. Which of the following measures the change in an option value given one percent change in interest rate?

- a. Delta
- b. Gamma
- c. Theta
- d. Vega
- e. Rho

16. Which of the following is NOT a primary component in theoretical option pricing calculation?

- a. Annual interest rate
- b. Quarterly dividend amount
- c. Change in volatility
- d. Strike price
- e. Days-to-expiration

17. The price of IBM is \$100. You establish the following position:

- Long 1 IBM 100 Call @ \$4.50

If the delta of the call is .50, what would be the theoretical price of the option if the stock decreased by \$1?

- a. \$2.50
- b. \$3
- c. \$3.40
- d. \$4
- e. \$4.50

18. You establish the following position:

- Short 1 XYZ 100 Put @ \$4

If the delta of the put is -.50 and the gamma is 0.0673, what would be the new delta if XYZ increases from \$100 to \$101?

- a. -0.3634
- b. -0.4327
- c. -0.5073
- d. -0.6346
- e. -0.7692



773 435 3210 Voice  
773 435 3232 Fax

## Portfolio Margining Risk Disclosure Statement

### Overview of Portfolio Margining

1.) Portfolio margining is a margin methodology that sets margin requirements for an account based on the greatest projected net loss of all positions in a “security class” or “product group” as determined by an options theoretical pricing model using multiple pricing scenarios. These pricing scenarios including scenarios for options are designed to measure the theoretical loss of the positions given changes in both the underlying price and implied volatility inputs to the model.

2.) The goal of portfolio margining is to set levels of margin that more precisely reflect actual net risk. The customer benefits from the portfolio margining in that margin requirements calculated on net risk are generally lower than alternative “position” or “strategy” based methodologies for determining margin requirements. Lower margin requirements allow the customer more leverage in an account.

### Customers Eligible for Portfolio Margining

3.) To be eligible for portfolio margining, customers (other than broker-dealers or members of a national futures exchange) must be approved for writing uncovered options. If a customer (other than a broker dealer or members of a national futures exchange) wishes to trade in unlisted derivatives, the customer must have and maintain at all times account equity of not less than five million dollars, aggregated across all accounts under identical ownership at the clearing broker. This identical ownership requirement excludes accounts held by the same customer in different capacities (e.g., as a trustee and as an individual) and accounts where ownership is overlapping but not identical (e.g., individual accounts and joint accounts). In addition to the requirements of the self-regulatory organization rule, thinkorswim, Inc. and its clearing firm Penson Financial Services, Inc. reserves the right to mandate that each account must have a net liquidating value of at least \$125,000 to be eligible. Portfolio Margin is only available to margin (non-IRA) accounts. Smaller accounts can not be combined to meet the \$125,000 requirement.

### Positions Eligible for a Portfolio Margin Account

4.) All Margin equity securities (as defined in Section 220.2 of Regulation T of the Board of Governors of the Federal Reserve System), warrants on equity securities or on indices of equity securities, equity-based or equity-index based listed options, and security futures products (as defined in Section 3(a)(56) of the Securities Exchange Act of 1934) are eligible for a portfolio margin account. In addition, a customer that has an account with equity of at least five million dollars may establish and maintain positions in unlisted derivatives (e.g., OTC swaps, options) on an equity security or index of equity security or index of equity securities that can be priced by a theoretical pricing model approved by the Securities and Exchange Commission (SEC).



600 West Chicago Ave

Chicago, IL 60610

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### **Special Rules for Portfolio Margin Accounts**

5.) A portfolio margin account or sub-account will be subject to a minimum margin requirement of \$.375 for each listed option, unlisted derivative and security futures product, multiplied by the contract's or instrument's multiplier, carried long or short in the account. Other eligible products are not subject to a minimum margin requirement.

6.) If an account falls below \$100,000 this will create a Portfolio Margin deficiency. A margin deficiency in the portfolio margin account or sub-account, regardless of whether due to new commitments or the effect of adverse market movements on existing positions, must be met within one business day. Failure to meet a portfolio margin deficiency prior to the end of the first business day will result in a prohibition on entering any new orders, with the exception of new orders that reduce the margin requirement. Failure to meet a portfolio margin deficiency by the end of the second business day will result in immediate liquidation of positions on the second business day, to the extent necessary to eliminate the margin deficiency.

7.) Any shortfall in aggregate equity in an account, when required, must be met within one business day. Failure to meet a minimum equity deficiency by the end of the second business day will result in a prohibition on entering any new orders, with the exception of new orders that reduce the margin requirement, beginning the second business day and continuing until such time as the minimum equity requirement is satisfied, or if applicable, all unlisted derivatives are liquidated or transferred out of the portfolio margin account.

8.) When a broker-dealer carries a standard cash account or margin account for a customer, the broker-dealer is limited by the rules of the SEC and Options Clearing Corporation (OCC) to the extent to which the broker-dealer may permit the OCC to have a lien against long positions in those accounts. In contrast, the OCC will have a lien against all long option positions that are carried by a broker-dealer in a portfolio margin account, and this could under certain circumstances, result in greater losses to a customer having a long option positions in such an account in the event of the insolvency of the customer's broker. Furthermore, thinkorswim, Inc. and/or Penson Financial Services, Inc. has a lien on all long positions in a portfolio margin account, including margin equity securities, even if fully paid. Accordingly, to the extent that a customer does not borrow against long options and margin equity positions in a portfolio margin account or have margin or have margin requirements in the account against which the long options or margin equity securities can be credited, there is no advantage to carrying the long options and margin equity securities in a portfolio margin account and the customer should consider carrying them in an account other than a portfolio margin account.

9.) Customers participating in portfolio margining will be required to sign an agreement acknowledging that their security positions and property in the portfolio margin account will be subject to the customer protection provisions of Rule 15c3-3 under the Securities and Exchange Act of 1934 and the Securities Investor Protection Act.

10.) Penson Financial reserves the right to disable portfolio margin on an account if the account falls below \$100,000 or a call is not met in a timely fashion. Additionally, there is no guarantee that portfolio margin will be reinstated on an account that was removed from the Portfolio Margin System.



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773 435 3210 Voice  
773 435 3232 Fax

### **Special Risk of Portfolio Margin Accounts**

- 11.) Portfolio margining generally permits greater leverage in an account, and greater leverage creates greater losses in the event of adverse market movements.
- 12.) All accounts are approved for Short Uncovered Option positions therefore each customer must know and understand the risks of these types of strategies.
- 13.) Because the maximum time limit for meeting a margin deficiency is shorter than in a standard margin account, there is increased risk that a customer's portfolio margin account will be liquidated involuntarily, possibly causing losses to the customer.
- 14.) Because portfolio margin requirements are determined using sophisticated mathematical calculations and theoretical values that must be calculated from market data, it may be more difficult for customers to predict the size of future margin deficiencies in a portfolio margin account. This is particularly true in the case of customers who do not have access to specialized software necessary to make such calculations or who do not receive theoretical values calculated and distributed by approved vendor of theoretical values.
- 15.) For the reasons noted above, a customer that carries long eligible positions in a full portfolio margin account could, under certain circumstances, be less likely to recover the full value of these positions in the event of the insolvency of thinkorswim, Inc.
- 16.) Trading of margin equity securities, warrants on equity securities or on indices of equity securities, listed options, unlisted derivatives, and security futures products in a portfolio margin account is generally subject to all the risks of trading those same products in a standard securities margin account. Customers should be thoroughly familiar with the risk disclosure materials applicable to those products, including the booklets entitled "Characteristics and Risks of Standardized Options". Because this disclosure statement does not disclose the risks and other significant aspects of trading in other security futures products and options, customers should review those materials carefully before trading in a portfolio margin account.
- 17.) Customers should consult with their tax advisers to be certain that they are familiar with the tax treatment of transactions in margin equity securities, warrants on equity securities or on indices of equity securities, listed options, unlisted derivatives, and securities futures products, including tax consequences of trading strategies involving both security futures and option contracts.
- 18.) The descriptions in this disclosure statement relating to eligibility requirements for portfolio margin accounts, and minimum equity and margin requirements for those accounts are minimums imposed under the self-regulatory organization rules. Time frames within which margin and equity deficiencies must be met are maximums imposed under the self-regulatory organization rules. Broker-dealers may impose their own more stringent requirements.
- 19.) Customers should bear in mind that the discrepancies in the cash flow characteristics of security futures and certain options are still present even when those products are carried together in a portfolio margin account. In addition, discrepancies in the cash flow characteristics of



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certain unlisted derivatives may also be present when those products are carried in a portfolio margin account. Both security futures and options contracts are generally marked to the market at least once each business day. Similarly, certain unlisted derivatives may also be marked to the market on a daily basis. However, there may be incongruity between each eligible product in that marks may take place with different frequency and at different times within the day. For example, when a security futures contract is marked to the market, the gain or loss is immediately credited to or debited from, respectively, the customer's account in cash. While a change in the value of a long option contract may increase or decrease the equity in the account, the gain or loss is not realized until the option is liquidated, exercised, or assigned. Accordingly, a customer may be required to deposit cash in the account in order to meet a variation payment on a security futures contract even though the customer is in a hedged position and has experienced a corresponding (but yet unrealized) gain on an option. Alternatively, a customer who is in a hedged position and would otherwise be entitled to receive a variation payment on a security futures contract may find that the cash is required to be held in the account as margin collateral on an offsetting position.

### **Acknowledgement for Customers Utilizing a Portfolio Margin Account**

As discussed in the Portfolio Margining Risk Disclosure Statement, portfolio margining must be conducted in a margin account dedicated exclusively to portfolio margining. Portfolio margin accounts are treated as securities accounts carried with broker-dealers. As such, positions in portfolio margin accounts are covered by Rule 15c3-3 under the Securities Exchange Act of 1934 which protects customer accounts.

Rule 15c3-3 under the Securities Exchange Act of 1934 requires that a broker or dealer promptly obtain and maintain physical possession or control of all fully-paid securities and excess margin securities and maintain a special reserve account for the benefit of their customers. Fully-paid securities are securities carried in a cash account and margin equity securities carried in a margin or special account (other than a cash account) that have been fully paid for. Excess margin securities are a customer's margin securities having a market value in excess of 140% of the total of the debit balances in the customer's non-cash accounts. For the purposes of Rule 15c3-3, securities held subject to a lien to secure obligations of the broker-dealer are not within the broker-dealer's physical possession or control. The Securities and Exchange Commission (SEC) staff has taken the position that all long option positions in a customer's portfolio margining account may be subject to such a lien by the Options Clearing Corporation (OCC) and will not be deemed fully-paid or excess margin securities under Rule 15c3-3.

The hypothecation rules under the Securities Exchange Act of 1934 (Rules 8c-1 and 15c2-1) prohibit broker-dealers from permitting the hypothecation of customer securities in a manner that allows those securities to be subject to any lien or liens in an amount that exceeds the customer's aggregate indebtedness. However, all long option positions in a portfolio margining account will be subject to the OCC's lien, including any positions that exceed the customer's aggregate indebtedness. Furthermore, all long positions, including margin equity securities, in a portfolio margin account are held subject to a lien by thinkorswim, Inc. and its clearing firm Penson Financial Services, Inc., even if fully paid for. The SEC staff has taken a position that would allow customers to carry positions in the portfolio margining accounts even when those positions exceed the customer's aggregate indebtedness. Accordingly, within a portfolio margin account, to the extent that you have long option and/or margin equity securities positions that do

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600 West Chicago Ave  
Chicago, IL 60610

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not operate to offset your aggregate indebtedness and thereby reduce margin requirement, you receive no benefit from carrying those positions in your portfolio margin account and incur the additional risk of the OCC's lien on your long option position(s) and thinkorswim, Inc. and/or our clearing firm Penson Financial Services, Inc. lien on all of your long positions.

The Securities Investor Protection Corporation insures customer accounts against the financial insolvency of a broker-dealer in the amount of up to \$500,000 to protect against the loss of registered securities and cash maintained in the account for purchasing securities or as proceeds from selling securities (although the limit on cash claims is \$100,000). Additionally, our clearing firm holds Excess SIPC Insurance of \$200,000,000 in the aggregate, over all customer accounts, subject to a maximum limit of \$900,000 per Customer in respect to cash. This "Excess SIPC" protection is in addition to the protection provided by the Securities and Investors Protection Act, which is administered by SIPC and is subject to certain conditions and limitations, details of which are available upon request. Note SIPC and Excess SIPC provide coverage against loss of securities and cash, not against market depreciation, fluctuation in market value of your securities or a trading loss.

By signing below you affirm that you have read and understood the *Portfolio Margining Risk Disclosure Statement* provided and Acknowledge and agree that:

THE UNDERSIGNED HAS/HAVE A COMPLETE UNDERSTANDING OF THE GUIDELINES AND POLICIES REGARDING THE EXTENSION OF CREDIT, MARGIN REQUIREMENTS, NET LIQUIDATIONS EQUITY AND THAT THE UNDERSIGNED WAIVE(S) ANY RIGHT TO REDEEM SHARES OF MONEY MARKET MUTUAL FUNDS WITHOUT THE MEMBER ORGANIZATION'S CONSENT AND THAT THE MEMBER ORGANIZATIONS RESERVES THE RIGHT TO REDEEM SHARES OF MONEY MARKET MUTUAL FUNDS IN CASH UPON REQUEST. LONG POSITIONS IN A PORTFOLIO MARGINING ACCOUNT WILL BE EXEMPTED FROM CERTAIN CUSTOMER PROTECTION RULES OF THE SECURITIES AND EXCHANGE COMMISSION AS DESCRIBED ABOVE AND WILL BE SUBJECT TO A LIEN BY THINKORSWIM, INC AND PENSON FINANCIAL SERVICES, INC, AS WELL AS THE OPTIONS CLEARING CORPORATION WITH RESPECT TO LONG OPTION POSITIONS, WITHOUT REGARD TO SUCH RULES.

Customer Account Number:

[REDACTED] 3933

Customer Name/Title:

Lavliuskiy Roman

(Printed/Title)

CUSTOM APPROVAL

Customer Name:

RX

(Signed)

for UNCOVERED  
OPTIONS PK

Joint Account Holder:

(Printed/Title)

Joint Account Holder:

(Signed)

Date:

28 of 2010

## **EXHIBIT 90**

**SUMMARY INFORMATION FOR MAKAROV OLEKSANDR****CUSTOMER SUMMARY FOR MAKAROV OLEKSANDR**

Title:	Makarov Oleksandr
Applicant ID:	████████207
Type:	INDIVIDUAL
Legal Country:	Ukraine
Mailing Address:	Saksahanskihoho 92, 18, Kyiv, , 01032, Ukraine
E-mail Address	makarov081982@gmail.com
Primary user name:	makaro148
Employer:	Set /unset Employer
Good-faith Review:	
RELATIONSHIP TO FORMER ML RISK COUNTRY - Applicant (Legal Residence/Mailing Address) Account Holder	
RELATIONSHIP TO OTHER JURISDICTION THAT MAY POSE INCREASED FRAUD RISK - Applicant (Legal Residence/Mailing Address) Account Holder	
RELATIONSHIP TO Non FATF COUNTRY - Applicant (Legal Residence/Mailing Address) Account Holder	

**ACCOUNTS OF MAKAROV OLEKSANDR**

ID	VAN	Type	Activated Capabilities	Status	Priority	Equity yesterday
████████4548	████████74548	Active Trader	BOND CFD FOP FUT LEVFX OPT STK MRGN	Open.	LOW	68,581 USD
© 4548F	████████74548F	Active Trader	CFD MRGN	Open.	LOW	0 USD

**ACCOUNT SUMMARY FOR U1074548**

U1074548

ID:	████████4548 (VAN: ██████████4548)	Equity yesterday:	68,581 USD
Type:	Active Trader	Started:	04 Jun 2012
Activated Capabilities:	BOND CFD FOP FUT LEVFX OPT STK MRGN	Approved:	04 Jul 2012
Status:	Open. Clearing Status	Opened:	04 Jul 2012
Phylum	C - Customer	Funded:	06 Jul 2012
Priority	LOW Change Priority	Closed:	
IB Entity:	IB-UK	Operator:	
Currency:	USD	Estate:	

TMS tickets TMS sticky notes Assign to ASG Account Diagnostic

**ACCOUNT APPROVAL DECISION**

DATE OPENED	2012-07-04 16:31:39	DATE CLOSED	
-------------	---------------------	-------------	--

Decision: Accepted (Initial)  
 Proclamations:  
 Deciding User: ffalla

Decision: Accepted (Initial)

Proclamations

Deciding User: ffaila  
Deciding Time: 04 Jul 2012 11:09:06 EDT  
Deciding Reason: ffaila

## Initial Capabilities: BOND FUT LEVFX MRGN MULT OPT STK

### Additional Remarks:

<b>Approved Capabilities</b>	[BOND, CFD, FOP, FUT, LEVFX, MRGN, MULT, OPT, STK]
<b>Activated Capabilities</b>	[BOND, CFD, FOP, FUT, LEVFX, OPT, STK, MRGN]

ACCOUNT UPGRADE DECISIONS

All Requested Capabilities: BOND CFD FOP FUT LEVFX MRGN MULT OPT STK

Decision: Accepted

Proclamations

Deciding Officer: [ffalla](#)  
Deciding Time: 19 Jul 2012 04:50:19 EDT

**Compliance Officer:** ffaila  
**Compliance Time:** 19 Jul 2012 04:50:19 EDT

### **Additional Remarks:**

## **ADDITIONAL APPLICANT / REGISTRATION INFORMATION**

APPLICANT INFO	
Applicant ID: 1814207	Primary Phone: 380632485464
US Tax ID: N/A	Secondary Telephone: 380503822256
Country of Legal residence: Ukraine	Mailing Address #: Saksahanskoho 92, 18
Applicant Citizenship: Ukraine	Kyiv, N/A 01032
State of Legal residence: N/A	Ukraine
Market Data Status: Non-Professional	Currency/Rate: USD / 1.0
Token Type: Bingo	Marketing/Sales Info: Assisted by: self

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	Years of Experience	# of Trades per Year	Knowledge Level
<b>Stocks</b>	3	> 100	Extensive
<b>Options</b>	3	> 100	Extensive
<b>Commodities</b>	3	> 100	Extensive
<b>Bond</b>	3	26 - 50	Extensive
<b>FX</b>	3	> 100	Extensive
<b>CFD</b>	N/A	N/A	N/A

Bond	3	26 - 50
FX	3	> 100
CFD	N/A	N/A

FINANCIAL INFORMATION		
Estimated Net Worth	100,001 - 250,000	Estimated Liquid Net Worth Sources of Funds (Other than regular income)
Net Income	50,001 - 100,000	75,001 - 100,000 Sources Of Income
Total Assets	100,001	Accredited Investor for Private Placement?
		No
		Invited to Private Placement?

**INVESTMENT OBJECTIVES**

Growth, Trading, Speculation, Hedging

[Edit Objective](#)**DISCIPLINARY EVENTS****QUESTION**

	ANSWER	NATIVE ANSWER
Has the account holder ever been the subject of, or initiated, litigation, arbitration or any other type of dispute or settlement procedure with another broker or dealer?	No	N/A
Has the account holder ever been the subject of an investigation or proceeding by any commodities or securities exchange or regulatory authority or self-regulatory authority?	No	N/A

**COMPLIANCE/REGULATORY INFORMATION**

Is the account holder or any immediate family member who resides in the same household, registered as a broker-dealer or an employee, No director or owner of a securities or commodities brokerage firm?
<a href="#">Add Broker-Dealer Affiliation</a> ►

MiFID	Retail
MiFID Category	Retail

**QUESTION**

	ANSWER	NATIVE ANSWER
Is the account holder a member of an exchange or an associated person, affiliated person or employee of an exchange member?	No	N/A
Is the account holder a member of a regulatory or a self-regulatory organization?	No	N/A
Is the account holder: i) a director; ii) a 10% shareholder; or iii) a policy-making officer of any publicly traded company? (Restricted or Controlled Stock)	No	N/A
Is exactly a registered financial advisor?	N/A	N/A
Accepted Futures Arbitration Agreement?	Yes	Yes

[Edit Compliance Information](#) ► [Change Arbitration Agreement](#) ►**APPLICANT ASSOCIATED ENTITIES**

Personal Information for Mr. Makarov Oleksandr (Account Holder)	<a href="#">Hide all</a> ►
US-ASCII Fields	# of Dependents: 1 Marital Status: M Mother's Maiden Name:

Name:Mr. Makarov Oleksandr  
Entity ID: [REDACTED]  
Citizenship: Ukraine  
DOB: [REDACTED] 1982  
City of Birth: [REDACTED]

Show ►

Citizenship: Ukraine  
DOB: [REDACTED] 1982  
City of Birth: [REDACTED]

**Name:**Mr. Makarov Oleksandr  
**Entity ID:** [REDACTED] 2247  
**Ownership percentage:**100.0  
[Detailed Ownership Information ▾](#)

**US-ASCII Fields**

**Citizenship:** Ukraine  
**DOB:** [REDACTED] 1982  
**City of Birth:**  
**Drivers Lic #:**  
**Alien ID:**  
**Passport:** [REDACTED]960(Ukraine)  
**National ID:**  
has GreenCard: false

**Email:** makarov081982@gmail.com  
**Home Phone:** [REDACTED] 5464  
**Work Phone:** [REDACTED] 2256

**Residential Address:** Mayakovskoho, 2a, apt. 57  
Donetsk, 83055  
Ukraine  
**Mailing Address:** Saksaanskoho 92, 18  
Kyiv,01032  
Ukraine

**Business Nature Extended:** Steel sector strategy consulting, domestic and international metals and mining industry analysis

**Country Mismatch Description:**

**Name:**Makarov Oleksandr  
**Entity ID:** [REDACTED] 2247

**Native Language Fields (Language code: en)**

**Citizenship:** Ukraine  
**DOB:** [REDACTED] 1982  
**City of Birth:**  
**Drivers Lic #:**  
**Alien ID:**  
**Passport:** [REDACTED]960(Ukraine)  
**National ID:**  
has GreenCard: false

**Email:** makarov081982@gmail.com  
**Home Phone:** [REDACTED] 5464  
**Work Phone:** [REDACTED] 2256

**Residential Address:** Mayakovskoho, 2a, apt. 57  
Donetsk, 83055  
Ukraine  
**Mailing Address:** Saksaanskoho 92, 18  
Kyiv,01032

**Business Nature Extended:** Steel sector strategy consulting, domestic and international metals and mining industry analysis

**Country Mismatch Description:**

[Change Info ▾](#) [Request Proof of ID and DOB ▾](#) [Request Proof of Address ▾](#) [Request Proof of SSN ▾](#) [Mark as PEP ▾](#) [Ownership History ▾](#)

<b>Sessions:</b>	User: [REDACTED] 70148 ([REDACTED] 4548F)	Active in TWS: Yes	Role: OWNER	Token Type: Bingo	Entity Remap function moved to User Mgmt page
	User: [REDACTED] 70132 ([REDACTED] 38283)	Active in TWS: No	Role: OWNER	Token Type: N/A	Entity Remap function moved to User Mgmt page



## **EXHIBIT 91**

## **OFFERING MEMORANDUM**

The Directors, whose names appear in this document, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) the information contained in this document is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

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## **CASCADE INVESTMENT FUND**

(a company incorporated with limited liability under the  
laws of the Cayman Islands under registration number CT-276367)

---

NOVEMBER 2013

**DIRECTORY**  
**CASCADE INVESTMENT FUND**

**Registered Office**

Codan Trust Company (Cayman) Limited  
Cricket Square, Hutchins Drive  
PO Box 2681  
Grand Cayman KY1-1111  
Cayman Islands

**Directors**

Anatoliy Shakhnovskyy  
Oleksandr Makarov

**Investment Manager**

Cascade Asset Management  
c/o Codan Trust Company (Cayman) Limited  
Cricket Square, Hutchins Drive  
PO Box 2681  
Grand Cayman KY1-1111  
Cayman Islands

**Auditors to the Fund**

Deloitte Limited  
Maximos Plaza, Tower 1, 3rd Floor, 213 Arch.  
Makariou III Avenue, CY-3030 Limassol,  
Cyprus

**Administrator**

Trinity Fund Administration Limited  
Oyster Point, Temple Road, Blackrock, Co.  
Dublin, Ireland

**Legal Advisers to the Fund**

Conyers Dill & Pearman (Cayman) Limited  
Cricket Square, Hutchins Drive  
PO Box 2681  
Grand Cayman KY1-1111  
Cayman Islands

**Custodian**

Credit Suisse AG  
Paradeplatz 8  
8001 Zurich  
Switzerland

## DIRECTORS

### Directors' Functions

The Directors are responsible for the overall management and control of the Fund in accordance with the Articles. The Directors will review the operations of the Fund at regular meetings. For this purpose, the Directors will receive periodic reports from the Investment Manager detailing the performance of the Fund and providing an analysis of its investment portfolio. The Investment Manager will provide such other information as may from time to time be reasonably required by the Directors for the purpose of such meetings.

### Directors of the Fund

The Directors of the Fund are Anatoliy Shakhnovskyy and Oleksandr Makarov.

#### **Anatoliy Shakhnovskyy**

Mr. Anatoliy Shakhnovskyy received asset management certificate in 2008 from the State Commission for Regulation of Financial Services Markets of Ukraine. His experience in the field of asset management is greater than 5 years. Anatoliy served as director of the Asset Management Company Brokbusinessinvest and he is Chairman of the Supervisory Board of Nondiversified Corporate Investment Fund Cascade-Invest.

#### **Oleksandr Makarov**

Mr. Oleksandr Makarov has extensive experience in equity research in Dragon Capital – leading investment bank in Ukraine, established in 2000 and controlled by management, with a minority stake held by Goldman Sachs. He covered metals and mining sector, providing fundamental research for both domestic and international institutional clients. Prior to Dragon Capital Alexander was research analyst with focus on metals and mining in investment company Phoenix Capital. He has 10 years experience in equity research.

For the purposes of this Offering Memorandum, the address of each of the Directors is the registered office of the Fund.

## **EXHIBIT 92**

## SUMMARY INFORMATION FOR CONCORDE (BERMUDA) LIMITED

### CUSTOMER SUMMARY FOR CONCORDE (BERMUDA) LIMITED

Title:	Concorde (Bermuda) Limited				
Applicant ID:	1832445				
Type:	ORG - Separate Trading Limit (Master)				
Legal Country:	Bermuda				
Mailing Address:	2, Mechit'kova Str., Kyiv, 01601, Ukraine				
E-mail Address:	jb@concorde.com.ua				
Primary user name:	concor216				
Employer:	Set/Unset Employer				
Good-faith Review:	RELATIONSHIP TO FORMER ML RISK COUNTRY - Applicant (Legal Residence/Mailing Address) ORG (Principal Place of Business) Employee TRADER OWNER RELATIONSHIP TO OTHER JURISDICTION THAT MAY POSE INCREASED FRAUD RISK - Applicant (Legal Residence/Mailing Address) ORG (Principal Place of Business) Employee TRADER OWNER RELATIONSHIP TO Non FATF COUNTRY - Applicant (Legal Residence/Mailing Address) ORG (Principal Place of Business) Employee TRADER OWNER				

### ACCOUNTS OF CONCORDE (BERMUDA) LIMITED

ID	VAN	Type	Activated Capabilities	Status	Priority	Equity Yesterday
4237	[REDACTED]	Separate Trading Limit	CED FOP FUT LEVFX OPT SSF STK MRGN PMRGN	Open.	NORMAL+	-285,151 USD
4237F	[REDACTED]	Separate Trading Limit	CFD CMDTY FOP FUT MRGN	Open.	NORMAL+	0 USD
5253	[REDACTED]	Separate Trading Limit	FOP FUT LEVFX OPT STK MRGN PMRGN	Closed	NORMAL+	0 USD
7960	[REDACTED]	Separate Trading Limit	CFD FOP FUT LEVFX OPT SSF STK MRGN PMRGN	Open.	NORMAL+	1,492,387 USD
7960F	[REDACTED]	Separate Trading Limit	CFD CMDTY FOP FUT MRGN	Open.	NORMAL+	0 USD
1358	[REDACTED]	Separate Trading Limit	CFD FOP FUT LEVFX OPT SSF STK MRGN PMRGN	Open.	NORMAL+	247,423 USD
1358F	[REDACTED]	Separate Trading Limit	CFD CMDTY FOP FUT MRGN	Open.	NORMAL+	0 USD
2720	[REDACTED]	Separate Trading Limit	CFD FOP FUT LEVFX OPT SSF STK MRGN PMRGN	Open.	NORMAL+	296,788 USD
2720F	[REDACTED]	Separate Trading Limit	CFD CMDTY FOP FUT MRGN	Open.	NORMAL+	0 USD
3163	[REDACTED]	Separate Trading Limit	CFD FOP FUT LEVFX OPT SSF STK MRGN PMRGN	Open.	NORMAL+	0 USD
3163F	[REDACTED]	Separate Trading Limit	CFD CMDTY FOP FUT MRGN	Open.	NORMAL+	0 USD

ACCOUNT SUMMARY FOR U1094237

U1094237

ID:	4237 (VAN: [REDACTED] 04237)	Equity yesterday:	-285,151 USD
Type:	[REDACTED]	Started:	27 Jul 2012

U1094237

ID:	[REDACTED]	94237 (VAN): [REDACTED]	Equity yesterday:	-285,151 USD
Type:	Separate Trading Limit (Master)		Started:	27 Jul 2012
Activated Capabilities:	CFD FOP FUT LEVFX OPT SSF STK MRGN PMRGN		Approved:	11 Sep 2012
Status:	Open - Clearing Status		Opened:	11 Sep 2012
Phylum	C - Customer		Funded:	19 Sep 2012
Priority	NORMAL + Change Priority		Closed:	
IB Entity:	IBLLC:US		Operator:	
Currency:	USD		Estate:	
ECA status:	Disabled			

TMS tickets TMS sticky notes Assign to ASG

Account Diagnostic

**ACCOUNT APPROVAL DECISION****DATE OPENED**

2012-09-11 16:30:39

Decision: Accepted (Initial)

**Proclamations:** Based on the fact that this customer, an organization, has satisfied Interactive Brokers' threshold financial criteria to trade security futures, and based on IB's verification of relevant account information under IB's written account approval and anti-money laundering procedures, and based on my review of all information provided by the customer, including but not limited to the customer's investment objectives, annual income, net worth, liquid net worth and investment experience of its authorized officers, partners and/or traders, I approve this account for trading security futures.

Deciding User: dbridges

Deciding Time: 11 Sep 2012 13:44:26 EDT

Initial Capabilities: CFD FOP FUT LEVFX MRGN MULT OPT SSF STK

Additional Remarks: Pool review ok -Foreign Ownership-In

**ACCOUNT CAPABILITIES**

Approved Capabilities	CFD, CMDTY, FOP, FUT, LEVFX, MRGN, MULT, OPT, PMRGN, SSF, STK
Activated Capabilities	CFD, FOP, FUT, LEVFX, OPT, SSF, STK, MRGN, PMRGN

**ACCOUNT UPGRADE DECISIONS**

All Requested Capabilities: CFD CMDTY FOP FUT LEVFX MRGN MULT OPT PMRGN SSF STK

Decision: Accepted

**Proclamations:** Based on the fact that this customer, an organization, has satisfied Interactive Brokers' threshold financial criteria to trade security futures, and based on IB's verification of relevant account information under IB's written account approval and anti-money laundering procedures, and based on my review of all information provided by the customer, including but not limited to the customer's investment objectives, annual income, net worth, liquid net worth and investment experience of its authorized officers, partners and/or traders, I approve this account for trading security futures.

Deciding Officer: dbridges

Deciding Time: 16 Oct 2012 17:21:29 EDT

Compliance Officer: dbridges

Compliance Time: 16 Oct 2012 17:21:29 EDT

Additional Remarks:

## Additional Remarks:

All Requested Capabilities: CFD FCP FUT LEVFX MRGN MULT OPT PMRGN SSF STK

Decision: Accepted

**Proclamations:** Based on the fact that this customer, an organization, has satisfied Interactive Brokers' threshold financial criteria to trade security futures, and based on IB's verification of relevant account information under IB's written account approval and anti-money laundering procedures, and based on my review of all information provided by the customer, including but not limited to the customer's investment objectives, annual income, net worth, liquid net worth and investment experience of its authorized officers, partners and/or traders, I approve this account for trading security futures.

I have reviewed and approved this account for portfolio margin, based on my review of all financial and investment information provided by the customer, and based on the fact that the account is eligible for uncovered option trading and has acknowledged receipt of and agreement with the Portfolio Margin Risk Disclosure.

Deciding Officer: smitman

Deciding Time: 03 Oct 2012 11:54:14 EDT

Compliance Officer: dbridges

Compliance Time: 03 Oct 2012 09:53:30 EDT

Risk Officer: smitman

Risk Time: 03 Oct 2012 11:54:14 EDT

Additional Remarks:

## ADDITIONAL APPLICANT / REGISTRATION INFORMATION

## APPLICANT INFO

Applicant ID: 1832445  
 US Tax ID: N/A  
 Country of Legal residence: Bermuda  
 Applicant Citizenship: Bermuda  
 State of Legal residence: N/A  
 Market Data Status: Professional  
 Token Type: Gold

Primary Phone:+380443915577  
 Secondary Telephone:+380443915573  
 FAX #:+380443915571

Mailing Address #2 Mechnykova Str.  
 Kyiv, N/A 01601  
 Ukraine

Currency/Rate: USD / 1.0

## Marketing/Sales Info:

Assisted by: sales.rep  
 Helpers name: Anna Kossov  
 Solicited by: Anna Kossov

Use Trader IDs: Disabled

Change Applicant Information \*

## INVESTMENT EXPERIENCE

	Years of Experience	# of Trades per Year	Knowledge Level
Stocks	6 - 10	> 100	Extensive
Options	6 - 10	26 - 50	Good
Commodities	6 - 10	> 100	Good
Bond	0	0	0
FX	6 - 10	> 100	Extensive
CFD	N/A	N/A	0

SEARCH AND FILTERATION

FX	6 - 10	> 100	Extensive
CFD	N/A	N/A	0
<b>FINANCIAL INFORMATION</b>			
<b>Estimated Net Worth</b>	10,000,001 - 25,000,000	Estimated Liquid Net Worth	250,001 - 500,000
<b>Net Income</b>	> 1,000,001	<b>Sources of Funds (Other than regular income)</b>	N/A
<b>Total Assets</b>	25,000,001	<b>Accredited Investor for Private Placement?</b>	No
<b>INVESTMENT OBJECTIVES</b>			
Growth, Trading, Speculation			
<a href="#">Edit Objective</a>			
<b>DISCIPLINARY EVENTS</b>			
<p><b>QUESTION</b></p> <p>Has the organization or any of its officers or authorized traders ever been the subject of, or initiated, litigation, arbitration or any other type of dispute or settlement procedure with another broker or dealer? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Has the organization or any of its officers or authorized traders ever been the subject of an investigation or proceeding by any commodities or securities exchange or regulatory authority or self-regulatory authority? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Have any of the principals, officers or authorized traders of the Organization ever been arrested for, or convicted of, a crime? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p>			
<b>COMPLIANCE/REGULATORY INFORMATION</b>			
<p>Is the account holder or any immediate family member who resides in the same household, registered as a broker-dealer or an employee, No director or owner of a securities or commodities brokerage firm? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p><a href="#">Add Broker-Dealer Affiliation</a> ►</p> <p><b>QUESTION</b></p> <p>Is the Organization engaged in the <b>Brokerage business</b>? (e.g., is the Organization registered, authorized or operating as a futures commission merchant, or securities or futures brokerage firm in the US, UK, Canada or elsewhere) If Yes, provide details <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Is the organization required to be registered in the US, pursuant to <b>NFA By-Law 1101</b>, with the Commodities Futures Trading Commission, or in Canada with the IDA, or in any other country, as a futures commission merchant, introducing broker, commodity pool operator, commodity trading advisor, retail foreign exchange dealer or leverage transaction merchant? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>* <b>NFA By-Law 1101 Statement:</b> This is a proprietary account for an operating business (exempt from registration and no need to apply for exemption under NFA Guidance)</p> <p>Is the organization a member of an exchange or an associated person, affiliated person or employee of an exchange? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Is the account holder a member of a regulatory or a self-regulatory organization? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Is the account holder or any of its officers: i) a director, ii) a 10% shareholder, or iii) a policy-making officer of any publicly traded company? If Yes, enter stock symbols of companies: <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Does the organization control the trading in, or have an ownership interest in, any other interactive brokers accounts? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Is the organization operating under a banking license issued by an OFAC or ML Risk Country? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Is the organization operating under an offshore banking license? <b>ANSWER</b> No <b>NATIVE ANSWER</b> N/A</p> <p>Is the organization the branch of a foreign bank found or chartered in one of the listed countries? <b>ANSWER</b> Yes <b>NATIVE ANSWER</b> Yes</p> <p>Accepted <b>Futures Arbitration Agreement</b>?</p>			

Is the organization operating under an offshore banking license?  
 Is the organization the branch of a foreign bank found or chartered in one of the listed countries?  
 Accepted Futures Arbitration Agreement?

Edit Compliance Information ▾ Change Arbitration Agreement ▾

### APPLICANT ASSOCIATED ENTITIES

Personal Information for Mrs. Irene Pipera (0-SIGNATORY/TRADER/Other Officer/CEO) ▾ hide ▾

#### US-ASCII Fields

Name: Mrs. Irene Pipera  
 Entity ID: [REDACTED] 5184  
 Opened Account? Yes  
 Entity ID: [REDACTED] 84  
 Opened Account? Yes

Citizenship: Cyprus  
 DOB: [REDACTED] 1989  
 City of Birth:  
 Drivers Lic #:  
 Alien ID:  
 Passport: [REDACTED] 308(Cyprus)  
 National Id:  
 has Greencard: false

Residential Address: 6 Dafnis street,  
 Lythrodontas  
 Nicosia, 2365  
 Cyprus  
 Mailing Address: Same as residential address  
 Occupation:

#### Native Language Fields (Language code: en)

Citizenship: Cyprus  
 DOB: [REDACTED] 1989  
 City of Birth:  
 Drivers Lic #:  
 Alien ID:  
 Passport: [REDACTED] 308(Cyprus)  
 National Id:  
 has Greencard: false

Change Info ▾ Request Proof of ID and DOB ▾ Request Proof of Address ▾ Mark as PEP ▾ Ownership History ▾

#### Sessions:

User: [REDACTED] 07216 ([REDACTED] 237)	Active in TWS: Yes	Role: OWNER	Token Type: Gold	Entity Ramap function moved to User Mgmt page
User: [REDACTED] 07216 ([REDACTED] 2100)	Active in TWS: No	Role: OWNER	Token Type: N/A	Entity Ramap function moved to User Mgmt page

Associated Legal Entity Information for Concorde Solutions Ltd. (OWNER) ▾ hide ▾

Name: Concorde Solutions Ltd.  
 Entity ID: 14915422  
 Type: PRIVATE  
 Ownership percentage: 100.0

#### US-ASCII Fields

Country of Organization: British Virgin Islands  
 Tax ID: 1451478 (British Virgin Islands)

Address: BC Parus  
 2 Mechnykova Str. Kyiv, 01601  
 Ukraine

Change Info ▾ Request Proof of ID and DOB ▾ Request Proof of Address ▾ Mark as PEP ▾ Ownership History ▾

#### US-ASCII Fields

Name: Kostiantyn Fisun  
 Entity ID: [REDACTED] 0410  
 Citizenship: Ukraine  
 DOB: [REDACTED] 1969  
 City of Birth:

#### US-ASCII Fields

Email: kf@concorde.com.ua  
 Home Phone: + [REDACTED] 15577  
 Fax: + 380443915571

Personal Information for Kostiantyn Fisun ('TRADER')					
US-ASCII Fields			Native Language Fields (Language code: en)		
Name:Kostiantyn Fisun Entity ID: [REDACTED]	Citizenship: Ukraine DOB: [REDACTED] 1969 City of Birth: [REDACTED] Drivers Lic #: [REDACTED]5(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: kf@concorde.com.ua Home Phone: + [REDACTED] 5577 Fax: +380443915571	Name:Kostiantyn Fisun Entity ID: [REDACTED]410	Citizenship: Ukraine DOB: [REDACTED] 969 City of Birth: [REDACTED] Drivers Lic #: [REDACTED]55(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: kf@concorde.com.ua Home Phone: + [REDACTED] 915577 Fax: +380443915571
Residential Address: 2, Tarasivska, apt.53 klev,01063 Ukraine Mailing Address:	Residential Address: 2, Tarasivska, apt.53 klev,01063 Ukraine Mailing Address:	Residential Address: 2, Tarasivska, apt.53 klev,01063 Ukraine Mailing Address:	Residential Address: 2, Tarasivska, apt.53 klev,01063 Ukraine Mailing Address:	Residential Address: 2, Tarasivska, apt.53 klev,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2, Tarasivska, apt.53 klev,01062 Ukraine Mailing Address: Same as residential address Occupation:
Change Info ►	Request Proof of ID and DOB ►	Request Proof of Address ►	Mark as PEP ►	Ownership History ►	Occupation:
Sessions:					
Personal Information for Kostiantyn Fisun (Employee)					
US-ASCII Fields			Native Language Fields (Language code: en)		
Name:Kostiantyn Fisun Entity ID: [REDACTED]919	Citizenship: Ukraine DOB: [REDACTED] 969 City of Birth: [REDACTED] Drivers Lic #: [REDACTED]55(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: kf@concorde.com.ua Home Phone: + [REDACTED] 915577	Name:Kostiantyn Fisun Entity ID: [REDACTED]410	Citizenship: Ukraine DOB: [REDACTED] 969 City of Birth: [REDACTED] Drivers Lic #: [REDACTED]55(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: kf@concorde.com.ua Home Phone: + [REDACTED] 915577
Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:
Change Info ►	Mark as PEP ►	Ownership History ►	Role: CUSTOM	Token Type: N/A	Entity Remap function moved to User Mgmt page
Sessions:					
Personal Information for Maksym Slobodskyi (Employee)					
US-ASCII Fields			Native Language Fields (Language code: en)		
Name:Kostiantyn Fisun Entity ID: [REDACTED]419	Citizenship: Ukraine DOB: [REDACTED] 9319 City of Birth: [REDACTED] Drivers Lic #: [REDACTED]55(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: kf@concorde.com.ua Home Phone: + [REDACTED] 915577	Name:Kostiantyn Fisun Entity ID: [REDACTED]419	Citizenship: Ukraine DOB: [REDACTED] 9319 City of Birth: [REDACTED] Drivers Lic #: [REDACTED]55(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: kf@concorde.com.ua Home Phone: + [REDACTED] 915577
Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:	Residential Address: 2 Tarasovska, apt 53 klev, Ukraine,01062 Ukraine Mailing Address: Same as residential address Occupation:
Change Info ►	Mark as PEP ►	Ownership History ►	Role: CUSTOM	Token Type: N/A	Entity Remap function moved to User Mgmt page
Sessions:					

User: [REDACTED] (L 4237) Active in TWS:Yes	Role: CUSTOM	Token Type: N/A	Entity Remap function moved to User Mgmt page
<b>Personal Information for Maksym Slobodskyi (Employee)</b>			
Name:Maksym Slobodskyi Entity ID: [REDACTED] 8766	US-ASCII Fields	Email: mslslobodskyi@gmail.com Home Phone: + [REDACTED] 573	Residential Address: O. Schmidta 31., apt. 37 Kyiv, Kyiv, 01014 Ukraine Mailing Address: Same as residential address Occupation:
Citizenship: Ukraine DOB: [REDACTED] 1987 City of Birth: Drivers Lic #: Alien ID: Passport: [REDACTED] 356(Ukraine) has Greencard: false National ID: [REDACTED] 356(Ukraine) has Greencard: false	Native Language Fields (Language code: en)	Email: mslslobodskyi@gmail.com Home Phone: + [REDACTED] 15573	Residential Address: O. Schmidta 31., apt. 37 Kyiv, Kyiv, 01014 Ukraine Mailing Address: Same as residential address Occupation:
<b>Personal Information for Maksym Slobodskyi (TRADEr)</b>			
Name:Maksym Slobodskyi Entity ID: [REDACTED] 98766	US-ASCII Fields	Email: sm@concorde.com.ua Home Phone: + [REDACTED] 5573 Work Phone: + [REDACTED] 5577	Residential Address: O. Schmidta 31., apt. 37 Kyiv, Kyiv, 01014 Ukraine Mailing Address:
Change Info » Mark as PEP » Ownership History » Sessions: User: [REDACTED] (L 94237) Active in TWS:Yes	Role: CUSTOM	Token Type: N/A	Entity Remap function moved to User Mgmt page
<b>Personal Information for Maksym Slobodskyi (TRADEr)</b>			
Name:Maksym Slobodskyi Entity ID: [REDACTED] 93	US-ASCII Fields	Email: sm@concorde.com.ua Home Phone: + [REDACTED] 5573 Work Phone: + [REDACTED] 5577	Residential Address: O. Schmidta 31., apt. 37 Kyiv, Kyiv, 01014 Ukraine Mailing Address:
Citizenship: Ukraine DOB: [REDACTED] 1987 City of Birth: Drivers Lic #: Alien ID: Passport: [REDACTED] 928(Ukraine) has Greencard: false National ID: [REDACTED] 928(Ukraine) has Greencard: false	Native Language Fields (Language code: en)	Occupation:	Occupation:
Citizenship: Ukraine DOB: [REDACTED] 987 City of Birth: Drivers Lic #: Alien ID: Passport: [REDACTED] 928(Ukraine) has Greencard: false National ID: [REDACTED] 928(Ukraine) has Greencard: false	Request Proof of Address » Request Proof of ID and DOB »	Mark as PEP »	Ownership History »
Sessions: User: [REDACTED] (L 7960) Active in TWS:Yes	Role: TRADER	Token Type: None	Entity Remap function

<p><b>Sessions:</b></p> <p>User: [REDACTED] (216 ([REDACTED] 7960)) Active In TWS: Yes</p>	<p>Role: TRADER Token Type: None</p>	<p>Email: pvk@concorde.com.ua Home Phone: + [REDACTED] 15577</p>	<p>Residential Address: Gerzena street 17-25 Kiev, Ukraine, 04050</p>
<a href="#">hide ▾</a>			
<p>Personal Information for Petro Vinnikov (Employee)</p>			
<p><a href="#">US-ASCII Fields</a> <a href="#">Native Language Fields (Language code: en)</a> <a href="#">hide ▾</a></p>			
<p>Name: Petro Vinnikov Entity ID: [REDACTED] 63</p> <p>Citizenship: Ukraine DOB: [REDACTED] 983</p> <p>City of Birth: Drivers Lic #: [REDACTED] 788(Ukraine)</p> <p>Alien ID: Passport: National ID: has Greencard: false</p> <p>Citizenship: Ukraine DOB: [REDACTED] 983</p> <p>City of Birth: Drivers Lic #: [REDACTED] 788(Ukraine)</p> <p>Alien ID: Passport: National ID: has Greencard: false</p>			
<a href="#">Occupation:</a>			
<p>Personal Information for Maksym Slobodskyi (TRADER)</p>			
<p><a href="#">US-ASCII Fields</a> <a href="#">Native Language Fields (Language code: en)</a> <a href="#">hide ▾</a></p>			
<p>Name: Maksym Slobodskyi Entity ID: [REDACTED] 49</p> <p>Citizenship: Ukraine DOB: [REDACTED] 987</p> <p>City of Birth: Drivers Lic #: [REDACTED]</p> <p>Alien ID: Passport: [REDACTED] 28(Ukraine)</p> <p>National ID: has Greencard: false</p>			
<a href="#">Occupation:</a>			
<p>Personal Information for Maksym Slobodskyi (TRADER)</p>			
<p><a href="#">US-ASCII Fields</a> <a href="#">Native Language Fields (Language code: en)</a> <a href="#">hide ▾</a></p>			
<p>Name: Maksym Slobodskyi Entity ID: [REDACTED] 549</p> <p>Citizenship: Ukraine DOB: [REDACTED] 987</p> <p>City of Birth: Drivers Lic #: [REDACTED]</p> <p>Alien ID: Passport: [REDACTED] 28(Ukraine)</p> <p>National ID: has Greencard: false</p>			
<a href="#">Occupation:</a>			
<p>Request Proof of ID and DOB ▾</p>			
<p><a href="#">Change Info ▾</a> <a href="#">Mark as PEP ▾</a> <a href="#">Request Proof of Address ▾</a> <a href="#">Request Proof of DOB ▾</a> <a href="#">Mark as PEP ▾</a> <a href="#">Ownership History ▾</a></p>			
<p><b>Sessions:</b></p>			

[Change Info](#) ► [Request Proof of ID and DOB](#) ► [Request Proof of Address](#) ► [Mark as PEP](#) ► [Ownership History](#) ►

<b>Sessions:</b>	User: [REDACTED] 216 ([REDACTED] 356F) <a href="#">Active in TWS</a> :Yes	Role: TRADER	Token Type: N/A	Entity Remap function moved to User Mgmt page
<a href="#">hide</a>				
	<b>Personal Information for Mr. Maksym Slobodskyi (TRADER)</b>			
<a href="#">US-ASCII Fields</a>				
Name:Mr. Maksym Slobodskyi Entity ID: [REDACTED]7482	Citizenship: Ukraine DOB: [REDACTED]1987 City of Birth: Drivers Lic #: KIA 311789(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: ytvostenko@concorde.com.ua Home Phone: + [REDACTED]	Residential Address: O. Shmidta 31., apt. 37 Kiev, 01014 Ukraine Mailing Address: O. Shmidta 31., apt. 37 Kyiv, 01014 Ukraine	Entity Remap function moved to User Mgmt page
<a href="#">Occupation</a>				
Name:Maksym Slobodskyi Entity ID: [REDACTED]7482	<b>Native Language Fields (Language code: en)</b>			
	Citizenship: Ukraine DOB: [REDACTED]1987 City of Birth: Drivers Lic #: KIA 311789(Ukraine) Alien ID: Passport: National ID: has Greencard: false	Email: ytvostenko@concorde.com.ua Home Phone: + [REDACTED]	Residential Address: O. Shmidta 31., apt. 37 Kiev, 01014 Ukraine Mailing Address: O. Shmidta 31., apt. 37 Kyiv, 01014	Entity Remap function moved to User Mgmt page
<a href="#">Occupation</a>				
<b>Change Info</b> ► <a href="#">Request Proof of ID and DOB</a> ► <a href="#">Request Proof of Address</a> ► <a href="#">Mark as PEP</a> ► <a href="#">Ownership History</a> ►				
<b>Sessions:</b>	User: [REDACTED] 216 ([REDACTED] 720) <a href="#">Active in TWS</a> :Yes	Role: TRADER	Token Type: N/A	Entity Remap function moved to User Mgmt page
<a href="#">hide</a>				
	<b>Personal Information for Alisa Tykhomirova (Employee)</b>			
Name:Alisa Tykhomirova Entity ID: 1 [REDACTED]4273	City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Email: at@concorde.com.ua	Residential Address:  Mailing Address:  Occupation:	Entity Remap function moved to User Mgmt page
<b>Change Info</b> ► <a href="#">Mark as PEP</a> ► <a href="#">Ownership History</a> ►				
<b>Sessions:</b>	User: [REDACTED] 217 ([REDACTED] 237) <a href="#">Active in TWS</a> :No	Role: NONE	Token Type: N/A	Entity Remap function moved to User Mgmt page
<a href="#">hide</a>				
	<b>Personal Information for Alisa Tykhomirova / TRANSFER</b>			

User: <a href="#">alisa17</a> ( <a href="#">#94237</a> )	Active in TWS: No	Role: NONE	Token Type: N/A																
<a href="#">Personal Information for Alisa Tykhomirova (TRADER)</a> <span style="float: right;">[hide] [+] Entity / Emp function moved to User Mgmt page</span>																			
<b>US-ASCII Fields</b> <table border="1"> <tr> <td>Citizenship: Ukraine</td> <td>Email: at@concorde.com.ua</td> </tr> <tr> <td>DOB: ■■■■■ 1983</td> <td>Home Phone: +38043915577</td> </tr> <tr> <td>City of Birth: ■■■■■</td> <td>Work Phone: +38043915531</td> </tr> <tr> <td>Drivers Lic #: ■■■■■</td> <td>Fax: +38043915571</td> </tr> <tr> <td>Alien ID:</td> <td>Residential Address: Rusanovskaya nab. 6, apt. 166</td> </tr> <tr> <td>Passport:</td> <td>Kiev, 02154</td> </tr> <tr> <td>National ID:</td> <td>Ukraine</td> </tr> <tr> <td>has Greencard: false</td> <td>Mailing Address:</td> </tr> </table>				Citizenship: Ukraine	Email: at@concorde.com.ua	DOB: ■■■■■ 1983	Home Phone: +38043915577	City of Birth: ■■■■■	Work Phone: +38043915531	Drivers Lic #: ■■■■■	Fax: +38043915571	Alien ID:	Residential Address: Rusanovskaya nab. 6, apt. 166	Passport:	Kiev, 02154	National ID:	Ukraine	has Greencard: false	Mailing Address:
Citizenship: Ukraine	Email: at@concorde.com.ua																		
DOB: ■■■■■ 1983	Home Phone: +38043915577																		
City of Birth: ■■■■■	Work Phone: +38043915531																		
Drivers Lic #: ■■■■■	Fax: +38043915571																		
Alien ID:	Residential Address: Rusanovskaya nab. 6, apt. 166																		
Passport:	Kiev, 02154																		
National ID:	Ukraine																		
has Greencard: false	Mailing Address:																		
<span style="float: right;">Occupation: *</span>																			
<a href="#">Change Info</a> <a href="#">Request Proof of ID and DOB</a> <a href="#">Request Proof of Address</a> <a href="#">Mark as PFP</a> <a href="#">Ownership History</a>																			
<b>Sessions:</b> <table border="1"> <tr> <td>User: <a href="#">alisa16</a> ( <a href="#">#93163E</a> )</td> <td>Active in TWS: Yes</td> <td>Role: TRADER</td> <td>Token Type: N/A</td> </tr> </table>				User: <a href="#">alisa16</a> ( <a href="#">#93163E</a> )	Active in TWS: Yes	Role: TRADER	Token Type: N/A												
User: <a href="#">alisa16</a> ( <a href="#">#93163E</a> )	Active in TWS: Yes	Role: TRADER	Token Type: N/A																

Customer Account Supervision System - Interactive Brokers

## **EXHIBIT 93**

FORM NO. 6

Registration No. 41722



BERMUDA

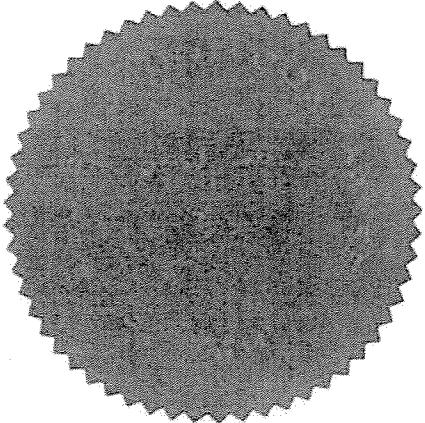
## CERTIFICATE OF INCORPORATION

I hereby in accordance with section 14 of *the Companies Act 1981* issue  
this Certificate of Incorporation and do certify that on the **8th** day of  
**April, 2008**

**Concorde (Bermuda) Limited**

was registered by me in the Register maintained by me under the  
provisions of the said section and that the status of the said company is that  
of an **exempted** company.

Given under my hand and the Seal of  
the REGISTRAR OF COMPANIES  
this **11th** day of **April, 2008**

  
for **Registrar of Companies**

## **EXHIBIT 94**

# COMPANIES ACT, 1995

MALTA

## CERTIFICATE OF REGISTRATION LIMITED LIABILITY COMPANY

(PURSUANT TO SECTION 77)

EXANTE Ltd

---

Name of Company

Portomaso Tower Annex Level 7, Vjal Portomaso, St Julians STJ 4011, Malta

---

Registered Office

[REDACTED]  
2182

---

Registration Number

This is to certify that the above-mentioned Company  
has been registered by the Registrar of Companies as a  
Limited Liability Company on the

4<sup>th</sup> March, 2011

---

Date of Registration

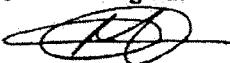


J. FARRUGIA

---

*f/Registrar of Companies*

This is a true and authentic photostat  
copy of the original



Dr. Maria Grech LL.B., LL.D.

4<sup>th</sup> March 11  
Dated this ..... day of ..... 20 .....

EXANTE

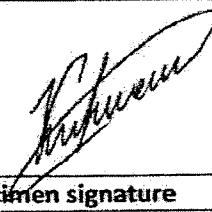
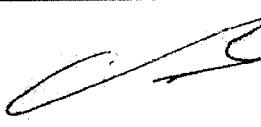
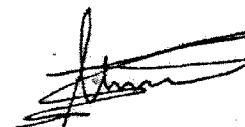


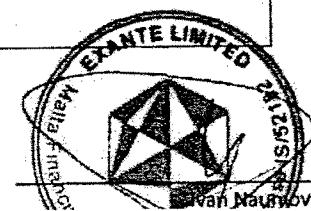
EXANTE Ltd.  
Portomaso Business Tower, Level 7,  
PTM01, St. Julians, Malta  
Tel.+356 20150000  
[www.exante.eu](http://www.exante.eu)

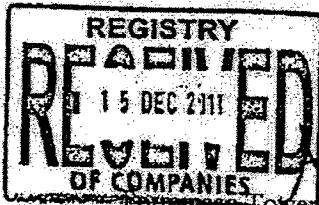
## Register of the Authorised Officers of EXANTE Limited

The undersigned, being the Secretary of EXANTE Limited (the "Company") hereby certify that the below is a list of the Authorised Officers of the Company together with their respective specimen signatures.

Furthermore, I can confirm that the below listed individuals are currently registered as the Directors of EXANTE Limited with the Registry of Companies at Malta Financial Services Authority. All the bellow signatories have general rights to act on behalf of EXANTE Limited solely.

1. Authorised signatory	Specimen signature
Last name, First name: KIRIENKO ALEXEY	
Country of Residence: MALTA	
Date of Birth: [REDACTED] 1984	
Nationality: RUSSIAN	
Passport No: 64 No [REDACTED] 2465	
2. Authorised signatory	Specimen signature
Last name, First name: NAUMOV IVAN	
Country of Residence: MALTA	
Date of Birth: [REDACTED] 1983	
Nationality: LITHUANIAN	
Passport No: [REDACTED] 3661	
3. Authorised signatory	Specimen signature
Last name, First name: EGLITIS GATIS	
Country of Residence: MALTA	
Date of Birth: [REDACTED] 1981	
Nationality: LATVIAN	
Passport No: [REDACTED] 4924	
4. Authorised signatory	Specimen signature
Last name, First name: KNYAZEV ANATOLI	
Country of Residence: RUSSIA	
Date of Birth: [REDACTED] 1984	
Nationality: RUSSIAN	
Passport No: 63 No [REDACTED] 0887	
5. Authorised signatory	Specimen signature
Last name, First name: MASLIAKOV VLADIMIR	
Country of Residence: RUSSIA	
Date of Birth: [REDACTED] 1984	
Nationality: RUSSIAN	
Passport No: [REDACTED] 5609	





CS2/82/8

EXANTE LTD

Annex Level 7, Vjal Portomaso, St. Julians STJ4011, Malta  
Company Registration No. C 52182

23 DEC 2011

RD

EXTRA-ORDINARY RESOLUTION OF ALL THE SHAREHOLDERS OF THE  
COMPANY PURSUANT TO ARTICLE 210 COMPANIES ACT AT A MEETING  
HELD AT THE  
COMPANY'S REGISTERED OFFICE  
ON THE 28<sup>th</sup> DAY OF NOVEMBER 2011

It is hereby Resolved that:

1. The authorized and issued share capital of the Company shall be increased by €12,371,966 (twelve million, three hundred and seventy-one thousand, nine hundred and sixty-six Euro);
2. The new authorized and issued share capital of the Company shall be of €12,628,456 (twelve million, six hundred and twenty-eight thousand, four hundred and fifty-six Euro) divided into 12,628,456 (twelve million, six hundred and twenty-eight thousand, four hundred and fifty-six) Ordinary shares of € 1.00 (one Euro) each;
3. 12,371,966 Ordinary shares shall be issued in the name of Larthemis Holdings Ltd, having Company Registration No. C 52181, and having its registered office at Portomaso Tower Annex Level 7, Vjal Portomaso, St. Julians STJ4011, Malta, in consideration for intangible property;
4. The Memorandum and Articles of Association of the Company shall be replaced in their entirety by the attached Memorandum and Articles of Association.

There being no further matters to discuss, the meeting was closed.

  
Mr. Alexey Kirienko  
Obo Larthemis Holdings Ltd  
Director

  
Alexey Kirienko  
obo Exante Limited

  
Mr. Ivan Naumov  
Obo Larthemis Holdings Ltd  
Director

This is a true and authentic photostat  
copy of the original

  
Dr. Maria Grech LL.B., LL.D.



Memorandum and Articles of Association of

EXANTE LTD

C 52182

A limited liability company

registered at the Registry of Companies of the Republic of Malta  
under the Companies Act, 1995.

This is a true and authentic photostat  
copy of the original

  
Dr. Maria Grech LL.B., LL.D.

EXANTE Limited

A limited liability company registered  
under the Malta Companies Act 1995

## MEMORANDUM OF ASSOCIATION

### EXANTE LTD

#### 1. Name

The name of the company is EXANTE LTD.

#### 2. Registered Office

The registered office of the Company shall be situated at Portomaso Tower Annex Level 7, Vjal Portomaso, St. Julians STJ4011, Malta, or at any other address in Malta which may be determined from time to time by the Board of Directors.

#### 3. Private Company

The Company shall be a private company in terms of section 209 of the Companies Act, 1995.

#### 4. Objects

The objects of the Company shall be the following:

1. To provide any investment service under the Investment Services Act, 1994 and in particular to receive and transmit client orders, execute client orders, manage investments on behalf of clients and give investment advice.
2. To carry on any other business whatsoever this can be carried on in connection with the main business of the Company.

Nothing in the foregoing shall be construed as empowering or enabling the Company to carry out any activity or service which requires a license or is otherwise regulated under the Investment Services Act, (Cap.370), the Insurance Business Act, (CAP.403), the Insurance intermediaries Act, (CAP.487), the Banking Act, (CAP.371), the Financial Institutions Act, (CAP.376), and the Trusts and Trustees Act, (CAP.331, without a license or other necessary authorizations from the respective competent authority.

#### 5. Powers

In attaining its objects, the company shall have the following powers:

1. To take property on lease, to transfer any such property or right of lease and to grant rights over property acquired by the Company;
2. To acquire, sell, rent, lease and sub-lease, licence and sub-liscence in all parts of the world, all types of industrial, artistic and similar rights, including but not limited to copyrights, patents, design, trademarks and other similar or analogous rights and assets.
3. To license intellectual property of all kinds to enable the use of Malta as a base for international business activities;
4. To work, improve, manage, develop, exchange, hypothecate, charge, pledge, sell, dispose of, turn into account, grant options, rights and privileges over or otherwise deal with any assets of the Company;

**EXANTE Limited**

5. To employ, engage, appoint and dismiss employees, agents, contractors, and sub-contractors engaged for the purposes of the Company's operations;
6. To invest the Company's financial and other resources in such manner as the Company may determine from time to time;
7. To borrow and raise money in such manner as the Company shall deem fit including by the issue of bonds, debentures and debenture stock, and to secure the repayment of any money borrowed or raised or the performance of any obligation undertaken by the Company, by granting hypothecs, privileges, guarantees, pledges and other similar charges over its assets, present and future, including its uncalled capital;
8. To stand surety in favour of third parties and for the purpose to charge its assets as security for the obligations undertaken by such third parties;
9. To enter into any arrangements with Governmental authorities and agencies, companies and persons, and to obtain rights, contracts, options, licences and permits from the said authorities, agencies, companies and persons;

**6. Limited Liability**

The members' liability is limited to the amount, if any, unpaid on the share(s) respectively held by each member.

**7. Capital**

The Authorized and Issued Share Capital of the Company shall be of €12,628,456 (twelve million six hundred and twenty-eight thousand, four hundred and fifty-six Euros), divided into 12,628,456 (twelve million six hundred and twenty-eight thousand, four hundred and fifty-six) Ordinary shares of one € 1 (one Euro) each, fully paid up by the below-mentioned subscribers.

**8. Subscribers**

The Company's share capital is subscribed to as follows:

Lartemisis Holdings Ltd. Portomaso Tower Annex Level 7, Vjal Portomaso, St. Julians STJ4011, Malta. (Company Registration No. [REDACTED] 2181)	12,628,455 shares (no. 1 to 12,628,455)
---	--

Alexey Kirienko Partizanskaya Street, 13-2-19, Moscow 121351 Russian Federation. (Russian Passport No. [REDACTED] 0387)	1 share (no. 12,628,456)
--	-----------------------------

**9. Rights of Share Classes**

1. The shares in the original or any increased capital may be divided into several classes as the company may from time to time by Extraordinary Resolution determine.

EXANTE Limited

**10. Management**

1. The management and administration of the Company's affairs shall be entrusted to a Board of Directors consisting of not less than 2 (two) and not more than 5 (five) directors.
2. The first Director(s) of the Company shall be:

Ivan Naumov,  
Marii Ul'yanovoy Street,  
9-18  
Moscow, 119331,  
Russia  
Passport No. [REDACTED] 3661

Alexey Kirienko,  
Partizanskaya Street,  
13-2-19,  
Moscow,  
Russia, 121351  
Passport No. [REDACTED] 0387

Anatoli Knyazev,  
Vokzal'naya Street,  
3-37,  
Odintsovo,  
Moscow,  
Russia 143005  
Passport No. [REDACTED] 0887

Vladimir Masliakov,  
Vavilova Street,  
58-2-108,  
Moscow,  
Russia,  
119296,  
Passport No. [REDACTED] 5609

Gatis Eglitis,  
Sommerstedgade 14,  
1 TV, DK-1718,  
KBH-V,  
Denmark,  
Passport No. [REDACTED] 4924

3. The Directors mentioned in the Memorandum and other Directors who may from time to time be elected or appointed under the preceding paragraph shall be so elected or appointed until such time as they may resign or be removed from office by the shareholders in General Meeting.
4. A Director is empowered to appoint another person in his stead as an alternate director by means of a written instrument and such person so appointed shall enjoy all the powers and rights of the said Director including the right to attend and vote at meetings of the Board of Directors. Such alternate Director shall have a vote or votes in addition to his own vote, if any. Written instrument includes telefax or email communication.

EXANTE Limited

**11. Representation**

1. The legal and judicial representation of the Company shall be vested in any Director. Any Director shall be empowered to enter into any agreement, contract or obligation whether by public deed or by private writing including those creating real security over the assets of the Company such as a hypothec or a mortgage, to open bank accounts and to sign cheques, bills of exchange, promissory notes and other documentary credits on behalf of the Company.
2. Provided that in addition and without prejudice to the aforesaid, the Board of Directors of the Company may from time to time appoint any person or persons to represent the Company in a specific case or cases and to bind the Company as so specifically authorised in a Power of Attorney issued to such person or persons. Any Power of Attorney issued by the Company shall be executed by any Director or any person authorised by the Board of Directors for the purpose and such Power of Attorney shall be considered as executed by the Company.

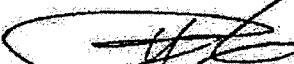
**12. Company Secretaries**

The Secretary of the Company shall be:

Ivan Naumov  
Marii Ul'yanovoy Street,  
9-1-8  
Moscow, 119331,  
Russia  
(Lithuanian Passport No. [REDACTED] 3661)

The undersigned persons hereby agree to constitute this Company in terms of the Companies Act 1995 and in pursuance of this Memorandum and Articles of Association, and to subscribe to the number of shares in the capital of the Company as indicated above.

  
Mr. Alexey Kirienko  
Passport No. [REDACTED] 0387  
for Lartemisis Holdings Ltd.

  
Mr. Ivan Naumov  
Passport No. [REDACTED] 3661  
for Lartemisis Holdings Ltd.

  
Mr. Alexey Kirienko  
Passport No. [REDACTED] 0387

## **EXHIBIT 95**

**SUMMARY INFORMATION FOR EXANTE LIMITED**

CUSTOMER SUMMARY FOR EXANTE LIMITED	
Title:	EXANTE Limited
Applicant ID:	D566
Type:	ORG - Omnisbus Introducing Broker - IBroker Master [REDACTED] 802
Legal Country:	Malta
Mailing Address:	Portomaso Business Tower, Level 7, ST. Julian's, PTM01, Malta
E-mail Address:	ge@exante.eu
Primary user name:	exante123
Employer:	Set/Unset Employer
Good-faith Review:	
<b>CAFFI - Risk Ranking 2 Discipline/ Public Information Ranking - A</b>	
RELATIONSHIP TO FORMER NL RISK COUNTRY - Employee TRADER OWNER	
RELATIONSHIP TO OTHER JURISDICTION THAT MAY POSE INCREASED FRAUD RISK - SIGNATORY Employee CEO TRADER OWNER	
Qualified Intermediary (QI) IBroker	

**ACCOUNT SUMMARY FOR UL1071343**

ID:	343 ( [REDACTED] 343)	Equity yesterday:	118 USD
Type:	Omnibus Introducing Broker	Started:	25 May 2012
Activated Capabilities:	BOND CFD FUND LEV/FX OPT SSF STK MRGN	Approved:	
Status:	Open, Clearing Status	Opened:	27 Jul 2012
Phylum:	C - Customer	Funded:	10 Aug 2012
Priority:	NOT SET Change Priority	Closed:	
IB Entity:	TBLCC-US	Operator:	
Currency:	USD	Estate:	
TMS tickets		Assign to ASG	Account Diagnostic

**ACCOUNT APPROVAL DECISION**

CLICK to see Account Reopen History

Not ready for approval or Approval not required.

Reject the Application    Terminate the Application

**ACCOUNT CAPABILITIES**

Approved Capabilities	[BOND, CFD, FUND, LEV/FX, MRGN, MULT, OPT, SSF, STK]
Activated Capabilities	[BOND, CFD, FUND, LEV/FX, OPT, SSF, STK, MRGN]

**ACCOUNT UPGRADE DECISIONS**

**ACCOUNT UPGRADE DECISIONS**

No Upgrade Decisions yet

**ADDITIONAL APPLICANT/REGISTRATION INFORMATION**

APPLICANT INFO	
Primary Phone:	[REDACTED]
Applicant ID:	123456
US Tax ID:	N/A
Country of Legal Residence:	Malta
Applicant Citizenship:	Malta
State of Legal Residence:	N/A
Market Data Status:	Professional
Change Applicant Information >	

FINANCIAL INFORMATION	
Estimated Net Worth	10,000,001 - 25,000,000
Net Income	40,000 - 45,000
Total Assets	10,000,001
Estimated Liquid Net Worth (Other than regular income)	1,000,001 - 5,000,000
Accredited Investor for Private Placement?	No
Invited to Private Placement?	No
INVESTMENT OBJECTIVES	
N/A	
Edit Objective	

DISCIPLINARY EVENTS	
QUESTION	ANSWER NATIVE ANSWER
Has the organization or any of its officers or authorized traders ever been the subject of, or initiated, litigation, arbitration or any other type of dispute or settlement procedure with another broker or dealer?	No N/A
Has the organization or any of its officers or authorized traders ever been the subject of an investigation or proceeding by any commodities or securities exchange or regulatory authority or self-regulatory authority?	No N/A
Have any of the principals, officers or authorized traders of the Organization ever been arrested for, or convicted of, a crime?	No N/A
COMPLIANCE/REGULATORY INFORMATION	
Is the account holder or any immediate family member who resides in the same household, registered as a broker-dealer or an employee, No	
Add Broker-Dealer Affiliation >	

QUESTION NATIVE ANSWER	
Is the Organization engaged in the brokerage business? (e.g., is the Organization registered, authorized or operating as a futures commission merchant, or securities or futures brokerage firm in the US, UK, Canada or elsewhere) If Yes, Yes N/A	

QUESTION	ANSWER	NATIVE ANSWER																																	
Is the Organization engaged in the <b>brokerage business</b> ? (e.g., is the Organization registered, authorized or operating as a futures commission merchant, or securities or futures brokerage firm in the US, UK, Canada or elsewhere) If Yes, provide details	Yes N/A	N/A																																	
Is the organization required to be registered in the US, pursuant to NFA By-Law 1101, with the Commodities Futures Trading Commission, or in Canada with the IDA, or in any other country, as a futures commission merchant, introducing broker, commodity pool operator, commodity trading advisor, retail foreign exchange dealer or leverage transaction merchant?	No N/A	N/A																																	
Is the organization a <b>member of an exchange</b> or an associated person, affiliated person or employee of an exchange member?	No N/A	N/A																																	
Is the account holder a member of a regulatory or a <b>self-regulatory organization</b> ?	No N/A	N/A																																	
Is the account holder or any of its officers: i) a director, ii) a 10% shareholder, or iii) a policy-making officer of any publicly traded company? If Yes, enter stock symbols of companies:	No N/A	N/A																																	
Does the organization control the trading in, or have an ownership interest in, any <b>other Interactive Brokers accounts</b> ?	No N/A	N/A																																	
Is the organization operating under a banking license issued by an OFAC or ML Risk Country?	no no N/A	no no N/A																																	
Is the organization operating under an <b>offshore banking license</b> ?	no no Yes	no no Yes																																	
Is the organization the branch of a foreign bank found or chartered in one of the listed countries?																																			
Accepted Future's Arbitration Agreement?																																			
	<a href="#">Edit Compliance Information</a> ▾ <a href="#">Change Arbitration Agreement</a> ▾																																		
<b>APPLICANT ASSOCIATED ENTITIES</b>																																			
<a href="#">Personal Information for Gatis Egilis (SIGNATORY/TRADEER, CEO)</a>																																			
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<table border="1"> <thead> <tr> <th colspan="2" style="text-align: left;">Personal Information for Gatis Egilis (SIGNATORY/TRADEER, CEO)</th> <th style="text-align: right;">hide</th> </tr> </thead> <tbody> <tr> <td colspan="2"> <b>Name:</b>Gatis Egilis  <b>Entity ID:</b>██████████  <b>Opened Account ?</b> Yes         </td> <td style="text-align: right;"> <b>Email:</b> ge@exante.eu  <b>Home Phone:</b> ██████████         </td> </tr> <tr> <td colspan="2"> <b>Citizenship:</b> Latvia  <b>DOB:</b>██████████  <b>City of Birth:</b>  <b>Drivers Lic #:</b>  <b>Alien ID:</b>  <b>Passport:</b>██████████  <b>National ID:</b>  <b>has Greencard:</b> false         </td> <td style="text-align: right;"> <b>Residential Address:</b> Portomaso Business Tower,            Level 7            St. Julians, PTM01            Malta  <b>Mailing Address:</b> Same as residential address  <b>Occupation:</b> </td> </tr> <tr> <td colspan="2"> <b>Name:</b>Gatis Egilis  <b>Entity ID:</b>██████████  <b>Opened Account ?</b> Yes         </td> <td style="text-align: right;"> <b>Email:</b> ge@exante.eu  <b>Home Phone:</b> ██████████         </td> </tr> <tr> <td colspan="2"> <b>Citizenship:</b> Latvia  <b>DOB:</b>██████████  <b>City of Birth:</b>  <b>Drivers Lic #:</b>  <b>Alien ID:</b>  <b>Passport:</b>██████████  <b>National ID:</b>  <b>has Greencard:</b> false         </td> <td style="text-align: right;"> <b>Residential Address:</b> Portomaso Business Tower,            Level 7            St. Julians, PTM01            Malta  <b>Mailing Address:</b> Same as residential address  <b>Occupation:</b> </td> </tr> <tr> <td colspan="2"> <b>Change Info</b> ▾ <b>Request Proof of ID and DOB</b> ▾ <b>Sessions:</b>  <b>User:</b> exante123 (11070802) <b>Active in TWS:</b> Yes         </td> <td style="text-align: right;"> <b>Request Proof of Address</b> ▾ <b>Mark as PEP</b> ▾ <b>Ownership History</b> ▾  <b>Role:</b> OWNER <b>Token Type:</b> N/A         </td> </tr> <tr> <td colspan="3" style="text-align: center; background-color: #cccccc;"> <a href="#">Personal Information for Mr. Ivan Naumov (TREASURER)</a> </td> </tr> <tr> <td colspan="3" style="text-align: center; background-color: #cccccc;"> <a href="#">US-ASCII Fields</a> </td> </tr> <tr> <td colspan="3" style="text-align: center; background-color: #cccccc;"> <a href="#">hide</a> </td> </tr> <tr> <td colspan="3" style="text-align: center; background-color: #cccccc;"> <a href="#">Entity Removal function moved to User Mgmt page</a> </td> </tr> <tr> <td colspan="3" style="text-align: center; background-color: #cccccc;"> <a href="#">hide</a> </td> </tr> </tbody> </table>			Personal Information for Gatis Egilis (SIGNATORY/TRADEER, CEO)		hide	<b>Name:</b> Gatis Egilis <b>Entity ID:</b> ██████████ <b>Opened Account ?</b> Yes		<b>Email:</b> ge@exante.eu <b>Home Phone:</b> ██████████	<b>Citizenship:</b> Latvia <b>DOB:</b> ██████████ <b>City of Birth:</b> <b>Drivers Lic #:</b> <b>Alien ID:</b> <b>Passport:</b> ██████████ <b>National ID:</b> <b>has Greencard:</b> false		<b>Residential Address:</b> Portomaso Business Tower, Level 7 St. Julians, PTM01 Malta <b>Mailing Address:</b> Same as residential address <b>Occupation:</b>	<b>Name:</b> Gatis Egilis <b>Entity ID:</b> ██████████ <b>Opened Account ?</b> Yes		<b>Email:</b> ge@exante.eu <b>Home Phone:</b> ██████████	<b>Citizenship:</b> Latvia <b>DOB:</b> ██████████ <b>City of Birth:</b> <b>Drivers Lic #:</b> <b>Alien ID:</b> <b>Passport:</b> ██████████ <b>National ID:</b> <b>has Greencard:</b> false		<b>Residential Address:</b> Portomaso Business Tower, Level 7 St. Julians, PTM01 Malta <b>Mailing Address:</b> Same as residential address <b>Occupation:</b>	<b>Change Info</b> ▾ <b>Request Proof of ID and DOB</b> ▾ <b>Sessions:</b> <b>User:</b> exante123 (11070802) <b>Active in TWS:</b> Yes		<b>Request Proof of Address</b> ▾ <b>Mark as PEP</b> ▾ <b>Ownership History</b> ▾ <b>Role:</b> OWNER <b>Token Type:</b> N/A	<a href="#">Personal Information for Mr. Ivan Naumov (TREASURER)</a>			<a href="#">US-ASCII Fields</a>			<a href="#">hide</a>			<a href="#">Entity Removal function moved to User Mgmt page</a>			<a href="#">hide</a>		
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Personal Information for Mr. Ivan Naumov (TREASURER)			
US-ASCII Fields			
Name: Mr. Ivan Naumov Entity ID: [REDACTED]	City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Residential Address:  Mailing Address: Same as residential address Occupation:	
Name: Ivan Naumov Entity ID: [REDACTED]	Native Language Fields (Language code: en)  City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Residential Address:  Mailing Address: Same as residential address Occupation:	
<a href="#">Change Info</a> » <a href="#">Request Proof of ID and DOB</a> »	<a href="#">Request Proof of Address</a> »	<a href="#">Mark as PEP</a> »	<a href="#">Ownership History</a> »
Personal Information for Mr. Ivan Naumov (SECRETARY)			
US-ASCII Fields			
Name: Mr. Ivan Naumov Entity ID: [REDACTED]	City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Residential Address:  Mailing Address: Same as residential address Occupation:	
Name: Ivan Naumov Entity ID: [REDACTED]	Native Language Fields (Language code: en)  City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Residential Address:  Mailing Address: Same as residential address Occupation:	
<a href="#">Change Info</a> » <a href="#">Request Proof of ID and DOB</a> »	<a href="#">Request Proof of Address</a> »	<a href="#">Mark as PEP</a> »	<a href="#">Ownership History</a> »
Personal Information for Mr. Adriano Cefai (COMP_OFFICER)			
US-ASCII Fields			
Name: Mr. Adriano Cefai Entity ID: [REDACTED]	City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Email: adriano@exante.eu Work Phone: [REDACTED] Residential Address:  Mailing Address: Same as residential address Occupation:	
Name: Adriano Cefai Entity ID: [REDACTED]	Native Language Fields (Language code: en)  City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Email: adriano@exante.eu Work Phone: [REDACTED] Residential Address:  Mailing Address: Same as residential address Occupation:	
<a href="#">Change Info</a> » <a href="#">Mark as PEP</a> »	<a href="#">Ownership History</a> »		
Personal Information for Alexey Kirienko Mr (TRADER, OWNER)			
US-ASCII Fields			
Name: Alexey Kirienko Mr Entity ID: [REDACTED]	Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: [REDACTED]	Email: alex@exante.eu Home Phone: [REDACTED] Work Phone: [REDACTED]	

Name: Alexey Kirienko Mr Entity ID: [REDACTED] 4312 Ownership percentage: 36.0	Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: Drivers Lic #: [REDACTED] Alien ID: Passport: 64No5252465(Russian Federation) National ID: has Greencard: false	Email: alex@exante.eu Home Phone: [REDACTED] Work Phone: [REDACTED]	Residential Address: Partizanskaya, 13-2-19 Moscow, Moscow, 119435 Malta Mailing Address: Same as residential address Occupation:	Native Language Fields (Language code: en)  Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: Drivers Lic #: [REDACTED] Alien ID: Passport: [REDACTED] 2465(Russian Federation) National ID: has Greencard: false
Change Info ► Request Proof of ID and DOB ►	Request Proof of Address ►	Mark as PEP ►	Ownership History ►	
Sessions:	User: [REDACTED] 729 TWS:Yes	Active in [REDACTED] TWS:Yes	Role: CUSTOM	Functions: AA_Authorizer_A_ACCOUNT HOLDER CLOSURE FINANCIAL_HISTORY FINANCIAL_INBOUND FINANCIAL_INSTRUCTION FINANCIAL_OUTBOUND FM_Authorizer_A_INTERNAL_ACCOUNT INTERNAL_FUNDS REGULATORY
				Privileges: RM TA UM Token: N/A
				Entity Remap function moved to User Mgmt page
				hide ►
Name: Anatoli Knyazev Mr Entity ID: [REDACTED] 1350 Ownership percentage: 27.0	Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: Drivers Lic #: [REDACTED] Alien ID: Passport: [REDACTED] 0887(Russian Federation) National ID: has Greencard: false	Email: ak@exante.eu Home Phone: [REDACTED] Work Phone: [REDACTED]	Residential Address: Vokzalnaya, 3-37 Otdicovo, Moscow, 119435 Russian Federation Mailing Address: Same as residential address Occupation:	Native Language Fields (Language code: en)  Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: Drivers Lic #: [REDACTED] Alien ID: Passport: [REDACTED] 0887(Russian Federation) National ID: has Greencard: false
Change Info ► Request Proof of ID and DOB ►	Request Proof of Address ►	Mark as PEP ►	Ownership History ►	
Sessions:	User: [REDACTED] 92 TWS:Yes	Active in [REDACTED] TWS:Yes	Role: CUSTOM	Functions: AA_Authorizer_A_ACCOUNT HOLDER CLOSURE FINANCIAL_HISTORY FINANCIAL_INBOUND FINANCIAL_INSTRUCTION FINANCIAL_OUTBOUND FM_Authorizer_A_INTERNAL_ACCOUNT INTERNAL_FUNDS REGULATORY
				Privileges: RM TA UM Token: N/A
				Entity Remap function moved to User Mgmt page
				hide ►
Name: Vladimir Maslikov Mr Entity ID: [REDACTED]	Citizenship: Russian Federation	Home Phone: [REDACTED]		Native Language Fields (Language code: en)  Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: Drivers Lic #: [REDACTED] Alien ID: Passport: [REDACTED] 0887(Russian Federation) National ID: has Greencard: false
Change Info ► Request Proof of ID and DOB ►	Request Proof of Address ►	Mark as PEP ►	Ownership History ►	
Sessions:	User: [REDACTED] 92 TWS:Yes	Active in [REDACTED] TWS:Yes	Role: CUSTOM	Functions: AA_Authorizer_A_ACCOUNT HOLDER CLOSURE FINANCIAL_HISTORY FINANCIAL_INBOUND FINANCIAL_INSTRUCTION FINANCIAL_OUTBOUND FM_Authorizer_A_INTERNAL_ACCOUNT INTERNAL_FUNDS REGULATORY
				Privileges: RM TA UM Token: N/A
				Entity Remap function moved to User Mgmt page
				hide ►

Personal Information for <b>Vladimir Masliakov Mr. (OWNER)</b>		<a href="#">hide</a>
<b>US-ASCII Fields</b>		
Name:Vladimir Masliakov Mr Entity ID: [REDACTED] 388	Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: [REDACTED] Drivers Lic #: [REDACTED] Alien ID: [REDACTED] Passport: [REDACTED] 5609(Russian Federation) National ID: has Greencard: false	Home Phone: [REDACTED] Work Phone: [REDACTED] Residential Address: Vavilova, 58/2-108 Moscow, Moscow,119435 Russian Federation Mailing Address: Same as residential address Occupation:
Name:Vladimir Masliakov Mr Entity ID: [REDACTED] 4388	Citizenship: Russian Federation DOB: [REDACTED] 1984 City of Birth: [REDACTED] Drivers Lic #: [REDACTED] Alien ID: [REDACTED] Passport: [REDACTED] 5609(Russian Federation) National ID: has Greencard: false	Native Language Fields (Language code: en) Home Phone: [REDACTED] Work Phone: [REDACTED] Residential Address: Vavilova, 58/2-108 Moscow, Moscow,119435 Russian Federation Mailing Address: Same as residential address Occupation:
<a href="#">Change Info</a> » <a href="#">Request Proof of ID and DOB</a> »	<a href="#">Request Proof of Address</a> » <a href="#">Mark as PEP</a> »	<a href="#">Ownership History</a> »
Personal Information for <b>Ivan Naumov Mr. (OWNER)</b>		<a href="#">hide</a>
<b>US-ASCII Fields</b>		
Name:Ivan Naumov Mr Entity ID: [REDACTED] 1427	Citizenship: Lithuania DOB: [REDACTED] 1983 City of Birth: [REDACTED] Drivers Lic #: [REDACTED] Alien ID: [REDACTED] Passport: [REDACTED] 3661(Lithuania) National ID: has Greencard: false	Home Phone: [REDACTED] Work Phone: [REDACTED] Residential Address: Ta Glorni Road, Two hoots, Adriatika Court St.Jullians,St.Jullians,STJ1610 Malta Mailing Address: Same as residential address Occupation:
Name:Ivan Naumov Mr Entity ID: [REDACTED] 4427	Native Language Fields (Language code: en) Citizenship: Lithuania DOB: [REDACTED] 1983 City of Birth: [REDACTED] Drivers Lic #: [REDACTED] Alien ID: [REDACTED] Passport: [REDACTED] 3661(Lithuania) National ID: has Greencard: false	Home Phone: [REDACTED] Work Phone: [REDACTED] Residential Address: Ta Glorni Road, Two hoots, Adriatika Court St.Jullians,St.Jullians,STJ1610 Malta Mailing Address: Same as residential address Occupation:
<a href="#">Change Info</a> » <a href="#">Request Proof of ID and DOB</a> »	<a href="#">Request Proof of Address</a> » <a href="#">Mark as PEP</a> »	<a href="#">Ownership History</a> »
Personal Information for <b>Andrey Okhlopkov (TRADER,Employee)</b>		<a href="#">hide</a>
<b>US-ASCII Fields</b>		
Name:Andrey Okhlopkov Entity ID: [REDACTED] 5660	Citizenship: Russian Federation DOB: [REDACTED] 1986 City of Birth: [REDACTED] Drivers Lic #: [REDACTED] Alien ID: [REDACTED] Passport: [REDACTED] 8111(Russian Federation) National ID: has Greencard: false	Email: oh@exante.eu Home Phone: [REDACTED] Residential Address: 16/2-834 Osennil Str Moscow, Moscow,121614 Russian Federation Mailing Address: Same as residential address Occupation:
Name:Andrey Okhlopkov Entity ID: [REDACTED] 6660	Native Language Fields (Language code: en) Citizenship: Russian Federation DOB: [REDACTED] 1986 City of Birth: [REDACTED] Drivers Lic #: [REDACTED] Alien ID: [REDACTED] Passport: [REDACTED] 8111(Russian Federation) National ID:	Email: oh@exante.eu Home Phone: [REDACTED] Residential Address: 16/2-834 Osennil Str Moscow, Moscow,121614 Russian Federation Mailing Address: Same as residential address



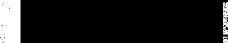
## **EXHIBIT 96**



## Account Form

 New     Change

<b>Account Name</b> EXANTE Limited						
Branch <b>EXT</b>	Account Acronym EXAN	SS or Tax I.D.	Citizenship	Resident of MALTA	Initial Transaction	Date 09 17 2012
<input type="checkbox"/> Option <input type="checkbox"/> DVP	<input type="checkbox"/> Margin <input type="checkbox"/> Cash	Discretionary Authority: <input checked="" type="checkbox"/> Full <input type="checkbox"/> Limited <input type="checkbox"/> Firm Employee				Age/DOB 31
Marital Status single	Dependents	How was account acquired? Call In <input type="checkbox"/> Walk In <input type="checkbox"/> Advertising <input type="checkbox"/> Cold Call <input type="checkbox"/> Other <input type="checkbox"/> If referral, name of person referring account _____ How long have you known customer _____				
**Customer(s) Name and Address <input checked="" type="checkbox"/> Principal <input type="checkbox"/> Investment Manager EXANTE Limited			**First Interested Party's Name and Address <input type="checkbox"/> Principal <input type="checkbox"/> Investment Manager Gatis Egлитис			
PORTOMASO BUSINESS TOWER ANNEX LEVEL 7			PORTOMASO BUSINESS TOWER ANNEX LEVEL 7			
MALTA (EU)			MALTA (EU)			
City ST.JULIANS State Zip STJ4011	City ST.JULIANS State Zip STJ4011					
Special Instructions (additional space on the back)			Delivery/Receive Instructions (If receive instructions are different from deliver instruction, check box and state instruction) <input type="checkbox"/>			
Bank Reference: HSBC Malta plc			DTC#	Institution ID		
Other Reference: FIDES Corporate Services Limited			Agent (BAS) #	Customer #		
Investment Objective (s): <input type="checkbox"/> Income <input type="checkbox"/> Growth <input type="checkbox"/> Speculation <input checked="" type="checkbox"/> Trading <input type="checkbox"/> Other (Specify)			Institutional Accounts – person authorized to transact business Name: GATIS EGLITIS Tel: ( ) _____ Name: IVAN NAUMOV Tel: ( ) _____			
Financial Background  Annual Income _____ Net Worth _____  Net Liquid Assets _____ Fed Tax Bracket _____ %			<u>Individual Accounts</u> Employer: _____ Type of Business: _____ Occupation: _____ Bus. Addr.: _____ Position: _____ Tel: ( ) _____ SSN: _____			
Home Address (If different from above)  Tel: ( ) _____			Spouse's Name: _____ Type of Business: _____ Employer: _____ Occupation: _____ Address: _____ Position: _____ Tel: ( ) _____			
Is customer an officer, director or 10% shareholder of any publicly held company? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO. Is the customer (1) a broker-dealer, (2) an officer, director, general partner, employee or agent of a broker-dealer, (3) a senior officer of a banking organization (any kind), insurance company, registered investment company, registered advisory firm or other institutional type account, or a person in the securities department – or in a position to influence transactions – of any such institution, (4) an immediate family member of any person in 2 or 3, or (5) an account in which a broker-dealer or any person in 2, 3, or 4, has a beneficial interest? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO. If "YES", specify (indicate name, relationship and position): Mr. GATIS EGLITIS, Director of EXANTE Ltd						
(NOTE: If the answer to above question is or becomes "YES", advise your manager before entering any new issue trades.)						
Is the RR registered in the state where the customer resides? <input type="checkbox"/> YES <input type="checkbox"/> NO						
Reg. Rep. _____	Date _____	Sup. Approval _____	Date _____			

Print Name:	Title:	Signature:
<u>MR. ANATOLI KNYAZEV</u>	<u>DIRECTOR</u>	
Personal Residence:		
<u>VOKZALNAYA STR. 3-37</u>		
Street Address:		
<u>RUSSIAN FEDERATION</u>		
Street Address:		
<u>MOSCOW</u>	<u>119027</u>	
City	State	Zip
Phone:		
 <u>0887 RUS PASSPORT</u>		
Social Security Number:		
Print Name:	Title:	Signature:
<u>MR. VLADIMIR NASHIYAKOV</u>	<u>DIRECTOR</u>	
Personal Residence:		
<u>VAVILOVA STR. 58/2 11028</u>		
Street Address:		
<u>RUSSIAN FEDERATION</u>		
Street Address:		
<u>MOSCOW</u>	<u>117022</u>	
City	State	Zip
Phone:		
 <u>5609 RUS PASSPORT</u>		
V Number:		

Dated 10 September 2012

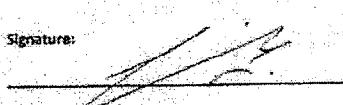
  
Signature

IVAN NAUMOV

Print Name:

DIRECTOR

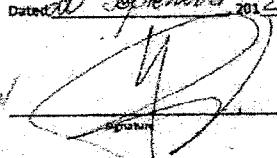
Title:

Print Name: M. GATISGLITIS Title: DIRECTOR Signature: 

Personal Residence: TANOE PLACE FL 2, TRIQ Street Address: GEO EXANTE-EU  
IS-JORNET, MALTA Street Address:  City:  State:  Zip:   
ST. JULIANS City:  State:  Zip:   
Old Phone:  Number:  4924 LVA PASSPORT

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_ Signature: \_\_\_\_\_  
Personal Residence: \_\_\_\_\_  
Street Address: \_\_\_\_\_ Email Address: \_\_\_\_\_  
Street Address: \_\_\_\_\_ Phone: \_\_\_\_\_  
Street Address: \_\_\_\_\_ Old Phone: \_\_\_\_\_  
City:  State:  Zip:   
Social Security Number: 

Dated: 20 September 2012



IVAN NAUMOV Print Name:

DIRECTOR Title:

LISTING OF OFFICERS AND DIRECTORS OF A CORPORATION

OR

GENERAL PARTNERS OF A PARTNERSHIP OR MANAGING MEMBERS OF A LIMITED LIABILITY COMPANY

TO: LEK SECURITIES CORPORATION

The following persons are authorized to act on behalf of EXANTE LIMITED

(short name of organization)

Print Name:

MR. IVAN NACHOV

Title:

DIRECTOR

Signature:



Personal Residence:

ADRIATHIA COASTER TWO HOTS

Street Address

TA'GIOINI ROAD, MALTA

Street Address 2

ST. JULIANES

City

ST JIGILO

State

Zip

IVAN@EXANTE.EU

Street Address

Phone

Cell Phone

3661

LTU PASSPORT

Signature:



Print Name:

MR. ALEXEY KIRIENKO

Title:

DIRECTOR

Personal Residence:

MICHURINSKY AV. 7/16/94

Street Address

RUSSIAN FEDERATION

Street Address 2

MOSCOW

City

49192

State

Zip

ALEX@EXANTE.EU

Street Address

Phone

Cell Phone

2460

RUS PASSPORT

## **EXHIBIT 97**

**SUMMARY INFORMATION FOR GLOBAL HEDGE CAPITAL FUND**

<b>CUSTOMER SUMMARY FOR GLOBAL HEDGE CAPITAL FUND</b>	
Title:	GLOBAL HEDGE CAPITAL FUND
Applicant ID:	██████████914
Type:	ORG - Pool - Single Hedge Fund
Legal Country:	Cayman Islands
Mailing Address:	Bolshoy Savitsky 11, Moscow, 119435, Russian Federation
E-mail Address	sk@dhcg.com
Primary user name:	sivo204
Employer:	Sat/Unsat Employer
Good-faith Review:	

**CAFFI - Risk Ranking 2 Discipline/Public Information Ranking - A**

RELATIONSHIP TO FORMER ML RISK COUNTRY - Applicant (Legal Residence/Mailing Address) ORG (Principal Place of Business) Employee SIGNATORY FUND_MANAGER ADVISORY_SIGNATURE TRADER SHF_Investmanager FUND_ADMIN
RELATIONSHIP TO OTHER JURISDICTION THAT MAY POSE INCREASED RISK - Applicant (Legal Residence/Mailing Address) ORG (Principal Place of Business) Employee SIGNATORY FUND_MANAGER ADVISORY_SIGNATURE TRADER SHF_Investmanager FUND_ADMIN
RELATIONSHIP TO Non FATF COUNTRY - Applicant (Legal Residence/Mailing Address) Employee ADVISORY_SIGNATURE TRADER SHF_Investmanager

**ACCOUNTS OF GLOBAL HEDGE CAPITAL FUND**

ID	VAN	Type	Activated Capabilities	Status	Priority	Equity yesterday
④ 4444	██████████4444	Pool	BOND CFD FOP FUT LEVFX OPT SSF STK MRGN PMRGN	Open.	NORMAL+	240,632 USD
⑤ 444F	██████████444F	Pool	CFD CMDTY MRGN	Open.	NORMAL+	0 USD

**ACCOUNT SUMMARY FOR U824444**

ID:	U824444	TMS tickets	TMS sticky notes	Assign to ASG	Account Diagnostic
Type:	Pool			Equity yesterday:	240,632 USD
Activated Capabilities:	BOND CFD FOP FUT LEVFX OPT SSF STK MRGN PMRGN			Started:	09 Nov 2009
Status:	Open.	Clearing Status		Approved:	22 Dec 2009
Phylum	C - Customer			Opened:	22 Dec 2009
Priority	NORMAL+	Change Priority		Funded:	14 Jan 2010
IB Entity:	IBLLC-US			Closed:	
Currency:	USD			Operator:	
				Estate:	

<b>ACCOUNT APPROVAL DECISION</b>	
DATE OPENED	2009-12-22 16:31:20

DATE OPENED	DATE CLOSED
2009-12-22 16:31:20	

Decision: Accepted (Initial)

Proclamations: Based on the fact that this customer, an organization, has satisfied Interactive Brokers' threshold financial criteria to trade security futures, and based on IB's verification of relevant account information under IB's written account approval and anti-money laundering procedures, and based on my review of all information provided by the customer, including but not limited to the customer's investment objectives, annual income, net worth, liquid net worth and investment experience of its authorized officers, partners and/or traders, I approve this account for trading security futures.

I have reviewed and approved this account for portfolio margin, based on my review of all financial and investment information provided by the customer, and based on the fact that the account is eligible for uncovered option trading and has acknowledged receipt of and agreement with the Portfolio Margin Risk Disclosure.

2

Deciding User: smitman

Deciding Time: 22 Dec 2009 15:03:09 EST

Initial Capabilities: BOND CFD FOP FUT MRGN MULT OPT PMRGN SSF STK

Compliance Officer: jbauch

Compliance Time: 22 Dec 2009 14:20:54 EST

Risk Officer: smitman

Risk Time: 22 Dec 2009 15:03:09 EST

Additional Remarks:

#### ACCOUNT CAPABILITIES

Approved Capabilities	BOND, CFD, FOP, FUT, LEVFX, MRGN, MULT, OPT, PMRGN, SSF, STK
Activated Capabilities	BOND, CFD, FOP, FUT, LEVFX, OPT, SSF, STK, MRGN, PMRGN

#### ACCOUNT UPGRADE DECISIONS

No Upgrade Decisions yet

#### ADDITIONAL APPLICANT/REGISTRATION INFORMATION

A APPLICANT INFO
Applicant ID: 2914
US Tax ID: N/A
Country of Legal Residence: Cayman Islands
Applicant Citizenship: Cayman Islands
State of Legal Residence: N/A
Market Data Status: Professional
Token Type: Bingo
Primary Phone: [REDACTED]
Secondary Telephone: [REDACTED]
FAX #: 74956468111
Mailing Address #: Bolshoy Savvinsky 11
Moscow, N/A 119335
Russian Federation
Currency/Rate: USD / 1.0
Marketing/Sales Info:

Token Type: Bingo

Currency/Rate: USD / 1.0

Marketing/Sales Info:

Assisted by: self

Use Trader IDs: Disabled

**A/B AUTHORIZATION**

RIGHT_CODE	DESCRIPTION	A_AUTHORIZERS	B_AUTHORIZERS	SECURITY_OFFICERS
ACCESS_RIGHTS_CONF	Access Rights Configuration	0	0	1
FINANCIAL_INBOUND	Deposits	1	1	0
FINANCIAL_INSTRUCTION	Settlement Instructions	1	1	0
INTERNAL_OUTBOUND	Withdrawals	1	1	0
INTERNAL_FUNDS	Internal Fund Transfers	1	1	0
POSITION_TRANSFERS	Position Transfers	1	1	0
USER_PRIVILEGE	Users and Access Rights	0	0	1

[Show list of authorizers and security officers»](#)[Change Applicant Information»](#)**INVESTMENT EXPERIENCE**

Years of Experience	# of Trades per Year	Knowledge Level
Stocks	> 100	Extensive
Options	11 - 25	Extensive
Commodities	> 100	Extensive
Bond	1 - 10	Extensive
FX	> 100	Extensive
CFD	N/A	0

**FINANCIAL INFORMATION**

Estimated Net Worth	3,000,000	Estimated Liquid Net Worth	3,000,000
Net Income	0	Sources of Funds (Other than regular income)	N/A
Total Assets	3,000,000	Accredited Investor for Private Placement?	No
		Invited to Private Placement?	No

**INVESTMENT OBJECTIVES**

Trading, Speculation, Hedging

[Edit Objective](#)**DISCIPLINARY EVENTS**

QUESTION	ANSWER	NATIVE ANSWER
In the past 5 years, has the Applicant or Applicant's Investment Adviser been party to a lawsuit, arbitration or any other type of dispute or settlement procedure with a broker or dealer?	No	N/A
In the past 5 years, has the Applicant or Applicant's Investment Adviser been a party to any investigation, complaint or proceeding by any federal regulatory agency, state regulatory agency, foreign regulatory authority, or any U.S. or foreign self-regulatory body?	No	N/A
Have any of the principals, officers, or authorized traders of the funds ever been convicted of a crime?	No	N/A

proceeding by any federal regulatory agency, state regulatory agency, foreign regulatory authority, or any U.S. or foreign self-regulatory body?	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Have any of the principals, officers, or authorized traders of the funds ever been convicted of a crime?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

**COMPLIANCE/REGULATORY INFORMATION**

Is the account holder or any immediate family member who resides in the same household, registered as a broker-dealer or an employee, No	<input type="checkbox"/> Add Broker-Dealer Affiliation »																
<table border="1"> <thead> <tr> <th>QUESTION</th> <th>ANSWER</th> </tr> </thead> <tbody> <tr> <td>Does the Fund solicit investors who reside in the US?</td> <td><input type="checkbox"/> no</td> </tr> <tr> <td>Does the fund currently have accounts for investors that reside in the US?</td> <td><input type="checkbox"/> no</td> </tr> <tr> <td>Would the fund accept new investors that reside in the US?</td> <td><input type="checkbox"/> no</td> </tr> <tr> <td>Are all owners/investors of the account members of the same family?</td> <td><input type="checkbox"/> no</td> </tr> <tr> <td>Does the fund own 10% or more of the shares in any publicly-traded company?</td> <td><input type="checkbox"/> no</td> </tr> <tr> <td>Does the fund have other Interactive Brokers accounts or do the principals, officers, or authorized traders of the funds have any other Interactive Brokers accounts? If yes, enter the usernames of the accounts.</td> <td><input type="checkbox"/> No [REDACTED] 7915, [REDACTED] 2124, [REDACTED] 8254</td> </tr> <tr> <td>Is the firm or any of its controlling officers registered in any capacity (e.g. as investment advisors) with any regulatory agency?</td> <td><input type="checkbox"/> no</td> </tr> </tbody> </table>		QUESTION	ANSWER	Does the Fund solicit investors who reside in the US?	<input type="checkbox"/> no	Does the fund currently have accounts for investors that reside in the US?	<input type="checkbox"/> no	Would the fund accept new investors that reside in the US?	<input type="checkbox"/> no	Are all owners/investors of the account members of the same family?	<input type="checkbox"/> no	Does the fund own 10% or more of the shares in any publicly-traded company?	<input type="checkbox"/> no	Does the fund have other Interactive Brokers accounts or do the principals, officers, or authorized traders of the funds have any other Interactive Brokers accounts? If yes, enter the usernames of the accounts.	<input type="checkbox"/> No [REDACTED] 7915, [REDACTED] 2124, [REDACTED] 8254	Is the firm or any of its controlling officers registered in any capacity (e.g. as investment advisors) with any regulatory agency?	<input type="checkbox"/> no
QUESTION	ANSWER																
Does the Fund solicit investors who reside in the US?	<input type="checkbox"/> no																
Does the fund currently have accounts for investors that reside in the US?	<input type="checkbox"/> no																
Would the fund accept new investors that reside in the US?	<input type="checkbox"/> no																
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Does the fund own 10% or more of the shares in any publicly-traded company?	<input type="checkbox"/> no																
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Is the firm or any of its controlling officers registered in any capacity (e.g. as investment advisors) with any regulatory agency?	<input type="checkbox"/> no																
<b>BASIS OF CLAIM FOR EXEMPTION</b>																	
<input type="checkbox"/> Memorandum of Association <input type="checkbox"/> edit Fund Compliance Info »																	
<input type="checkbox"/> Is the account holder or any immediate family member who resides in the same household, registered as a broker-dealer or an employee, No <input type="checkbox"/> director or owner of a securities or commodities brokerage firm?																	
<input type="checkbox"/> Add Broker-Dealer Affiliation » <input type="checkbox"/> Edit Compliance Information » <input type="checkbox"/> Change Arbitration Agreement »																	

<input type="checkbox"/> Is the Investment Advisor /Manager Registered With Any Regulatory Agency or Self-Regulatory Organization (U.S. or Non-U.S.)? <input type="checkbox"/> no																												
<input type="checkbox"/> Hide all » <input type="checkbox"/> Associated Legal Entity Information for Global Hedge Capital Management (SHF_InvestManager) <input type="checkbox"/> US-ASCII Fields																												
<table border="1"> <thead> <tr> <th colspan="2">US-ASCII Fields</th> <th>hide »</th> </tr> </thead> <tbody> <tr> <td>Country of Organization:</td> <td>Cayman Islands</td> <td>Phone: + [REDACTED]</td> </tr> <tr> <td>Tax ID:</td> <td>[REDACTED] 1641 (Cayman Islands)</td> <td>2nd Photo</td> </tr> <tr> <td>Type:</td> <td>LLC</td> <td>Address: Bolshoy Savvinsky 11 Moscow, 119455 Russian Federation</td> </tr> </tbody> </table>		US-ASCII Fields		hide »	Country of Organization:	Cayman Islands	Phone: + [REDACTED]	Tax ID:	[REDACTED] 1641 (Cayman Islands)	2nd Photo	Type:	LLC	Address: Bolshoy Savvinsky 11 Moscow, 119455 Russian Federation															
US-ASCII Fields		hide »																										
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<input type="checkbox"/> Change Info »   <input type="checkbox"/> Mark as PEP »   <input type="checkbox"/> Ownership History »   <input type="checkbox"/> hide »																												
<input type="checkbox"/> Personal Information for Alexey Kirilenko (GHCM, CEO-TRADER ADVISORY SIGNATORY) <input type="checkbox"/> US-ASCII Fields																												
<table border="1"> <thead> <tr> <th colspan="2">US-ASCII Fields</th> <th>hide »</th> </tr> </thead> <tbody> <tr> <td>Name:</td> <td>Alexey Kirilenko</td> <td>Email: alex@ghcm.com</td> </tr> <tr> <td>Entity ID:</td> <td>[REDACTED] 5830</td> <td>Home Phone: [REDACTED]</td> </tr> <tr> <td>Opened Account ?</td> <td>Yes</td> <td>Work Phone: [REDACTED]</td> </tr> <tr> <td colspan="2"></td> <td>Residential Address: Partizanskaya 13-2-19 Moscow, 121351</td> </tr> <tr> <td colspan="2"></td> <td>Cayman Islands</td> </tr> <tr> <td colspan="2"></td> <td>Mailing Address: Same as residential address</td> </tr> <tr> <td colspan="2"></td> <td>Occupation:</td> </tr> <tr> <td colspan="2"></td> <td>Native Language Fields (Language code: en)</td> </tr> </tbody> </table>		US-ASCII Fields		hide »	Name:	Alexey Kirilenko	Email: alex@ghcm.com	Entity ID:	[REDACTED] 5830	Home Phone: [REDACTED]	Opened Account ?	Yes	Work Phone: [REDACTED]			Residential Address: Partizanskaya 13-2-19 Moscow, 121351			Cayman Islands			Mailing Address: Same as residential address			Occupation:			Native Language Fields (Language code: en)
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Name:	Alexey Kirilenko	Email: alex@ghcm.com																										
Entity ID:	[REDACTED] 5830	Home Phone: [REDACTED]																										
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		Occupation:																										
		Native Language Fields (Language code: en)																										

<p><b>National ID:</b> <input type="text"/> has Greencard: false</p> <p><b>Native Language Fields (Language code: en)</b></p> <p><b>Citizenship:</b> Russian Federation  <b>DOB:</b> <input type="text"/> 1984  <b>City of Birth:</b> <input type="text"/>  <b>Drivers Lic #:</b> <input type="text"/>  <b>Alien ID:</b> <input type="text"/>  <b>Passport:</b> <input type="text"/> 1186(Russian Federation)  <b>National ID:</b> <input type="text"/>  <b>Has Greencard:</b> false</p>	<p><b>Mailing Address:</b> Same as residential address</p> <p><b>Occupation:</b> Cayman Islands</p>																								
<p><b>Name:</b> Alexey Kirilenko  <b>Entity ID:</b> <input type="text"/> 5861  <b>Opened Account ?</b> Yes</p>	<p><b>Email:</b> alex@ghcgc.com  <b>Home Phone:</b> + <input type="text"/>  <b>Work Phone:</b> + <input type="text"/></p> <p><b>Residential Address:</b> Partizanskaya 13-2-19  Moscow, 121351  Cayman Islands</p> <p><b>Mailing Address:</b> Same as residential address</p> <p><b>Occupation:</b> Cayman Islands</p>																								
<p><b>Change Info »</b>    <b>Request Proof of ID and DOB*</b>    <b>Request Proof of Address*</b>    <b>Mark as PEP*</b>    <b>Mark as PEP*</b>    <b>Ownership History*</b></p>	<p><b>Functions:</b> AA_Authorizer_A ACCOUNT HOLDER  CLOSURE FINANCIAL_HISTORY FINANCIAL_INBOUND  FINANCIAL_INSTRUCTION FINANCIAL_OUTBOUND  FM_Authorizer_A INTERNAL_ACCOUNT INTERNAL_FUNDS  REGULATORY USER_PRIVILEGE</p>																								
<p><b>Sessions:</b></p> <table border="1"> <tr> <td><b>User:</b> <input type="text"/> <b>Active in TWS:</b> Yes</td> <td><b>Role:</b> CUSTOM</td> <td><b>Privileges:</b> RM TA UM</td> <td><b>Token</b></td> <td><b>Type:</b> N/A</td> </tr> <tr> <td colspan="5"><b>Personal Information for Alexey Kirilenko (CEO/SIGNATORY/FUND_MANAGER)</b> <a href="#">hide</a></td> </tr> <tr> <td colspan="5"> <p><b>Name:</b> Alexey Kirilenko  <b>Entity ID:</b> <input type="text"/> 2057  <b>Opened Account ?</b> Yes</p> <p><b>Citizenship:</b> Russian Federation  <b>DOB:</b> <input type="text"/> 984  <b>City of Birth:</b> <input type="text"/>  <b>Drivers Lic #:</b> <input type="text"/>  <b>Alien ID:</b> <input type="text"/>  <b>Passport:</b> <input type="text"/> 1186(Russian Federation)  <b>National ID:</b> <input type="text"/>  <b>Has Greencard:</b> false</p> </td> </tr> <tr> <td colspan="5"> <p><b>Native Language Fields (Language code: en)</b></p> <p><b>Citizenship:</b> Russian Federation  <b>DOB:</b> <input type="text"/> 1984  <b>City of Birth:</b> <input type="text"/>  <b>Drivers Lic #:</b> <input type="text"/>  <b>Alien ID:</b> <input type="text"/>  <b>Passport:</b> <input type="text"/> 1186(Russian Federation)  <b>National ID:</b> <input type="text"/>  <b>Has Greencard:</b> false</p> </td> </tr> <tr> <td colspan="5"> <p><b>Change Info »</b>    <b>Request Proof of ID and DOB*</b>    <b>Request Proof of Address*</b>    <b>Mark as PEP*</b>    <b>Mark as PEP*</b>    <b>Ownership History*</b></p> </td> </tr> </table>	<b>User:</b> <input type="text"/> <b>Active in TWS:</b> Yes	<b>Role:</b> CUSTOM	<b>Privileges:</b> RM TA UM	<b>Token</b>	<b>Type:</b> N/A	<b>Personal Information for Alexey Kirilenko (CEO/SIGNATORY/FUND_MANAGER)</b> <a href="#">hide</a>					<p><b>Name:</b> Alexey Kirilenko  <b>Entity ID:</b> <input type="text"/> 2057  <b>Opened Account ?</b> Yes</p> <p><b>Citizenship:</b> Russian Federation  <b>DOB:</b> <input type="text"/> 984  <b>City of Birth:</b> <input type="text"/>  <b>Drivers Lic #:</b> <input type="text"/>  <b>Alien ID:</b> <input type="text"/>  <b>Passport:</b> <input type="text"/> 1186(Russian Federation)  <b>National ID:</b> <input type="text"/>  <b>Has Greencard:</b> false</p>					<p><b>Native Language Fields (Language code: en)</b></p> <p><b>Citizenship:</b> Russian Federation  <b>DOB:</b> <input type="text"/> 1984  <b>City of Birth:</b> <input type="text"/>  <b>Drivers Lic #:</b> <input type="text"/>  <b>Alien ID:</b> <input type="text"/>  <b>Passport:</b> <input type="text"/> 1186(Russian Federation)  <b>National ID:</b> <input type="text"/>  <b>Has Greencard:</b> false</p>					<p><b>Change Info »</b>    <b>Request Proof of ID and DOB*</b>    <b>Request Proof of Address*</b>    <b>Mark as PEP*</b>    <b>Mark as PEP*</b>    <b>Ownership History*</b></p>				
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<p><b>Sessions:</b></p> <table border="1"> <tr> <td><b>User:</b> slovo204 <input type="text"/> 4444</td> <td><b>Active in TWS:</b> Yes</td> <td><b>Role:</b> OWNER</td> <td><b>Token</b></td> <td><b>Type:</b> Bingo</td> </tr> <tr> <td colspan="5"><b>Associated Legal Entity Information for Global Hedge Capital Management (FUND_ADMIN)</b> <a href="#">hide</a></td> </tr> <tr> <td colspan="5"> <p><b>Name:</b> Global Hedge Capital Management  <b>Entity ID:</b> <input type="text"/> 2064  <b>Type:</b> ()</p> <p><b>Country of Organization:</b> <input type="text"/>  <b>Tax ID:</b> ()</p> <p><b>US-ASCII Fields</b></p> <p><b>Phone:</b> 7 <input type="text"/>  <b>2nd Pho:</b> <input type="text"/>  <b>Fax:</b> 74956408111  <b>Address:</b> Bolshoy Savvinsky 11  Moscow, 119435  Russian Federation</p> </td> </tr> <tr> <td colspan="5"> <p><b>Change Info »</b>    <b>Mark as PEP*</b>    <b>Ownership History*</b></p> </td> </tr> </table>	<b>User:</b> slovo204 <input type="text"/> 4444	<b>Active in TWS:</b> Yes	<b>Role:</b> OWNER	<b>Token</b>	<b>Type:</b> Bingo	<b>Associated Legal Entity Information for Global Hedge Capital Management (FUND_ADMIN)</b> <a href="#">hide</a>					<p><b>Name:</b> Global Hedge Capital Management  <b>Entity ID:</b> <input type="text"/> 2064  <b>Type:</b> ()</p> <p><b>Country of Organization:</b> <input type="text"/>  <b>Tax ID:</b> ()</p> <p><b>US-ASCII Fields</b></p> <p><b>Phone:</b> 7 <input type="text"/>  <b>2nd Pho:</b> <input type="text"/>  <b>Fax:</b> 74956408111  <b>Address:</b> Bolshoy Savvinsky 11  Moscow, 119435  Russian Federation</p>					<p><b>Change Info »</b>    <b>Mark as PEP*</b>    <b>Ownership History*</b></p>									
<b>User:</b> slovo204 <input type="text"/> 4444	<b>Active in TWS:</b> Yes	<b>Role:</b> OWNER	<b>Token</b>	<b>Type:</b> Bingo																					
<b>Associated Legal Entity Information for Global Hedge Capital Management (FUND_ADMIN)</b> <a href="#">hide</a>																									
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<p><b>Change Info »</b>    <b>Mark as PEP*</b>    <b>Ownership History*</b></p>																									

Russian Federation

[Change Info](#) | [Mark as PEP](#) | [Ownership History\\*](#)

<a href="#">Personal Information for Anatolii Knyazev (FUND_CONTACT)</a>		<a href="#">hide</a>
<a href="#">US-ASCII Fields</a>		
<b>Name:</b> Anatolii Knyazev <b>Entity ID:</b> [REDACTED]065	<b>City of Birth:</b> Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	<b>Email:</b> ak@ghcg.com <b>Residential Address:</b>  <b>Mailing Address:</b> Same as residential address <b>Occupation:</b>
<b>Name:</b> Anatolii Knyazev <b>Entity ID:</b> [REDACTED]2065	<b>Native Language Fields (Language code: en)</b>  <b>City of Birth:</b> Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	<b>Email:</b> ak@ghcg.com <b>Residential Address:</b>  <b>Mailing Address:</b> Same as residential address <b>Occupation:</b>
<a href="#">Change Info</a>   <a href="#">Mark as PEP</a>   <a href="#">Ownership History*</a>		
<a href="#">Sessions:</a>		
<b>User:</b> anato930 [REDACTED]1444)	<b>Active in TWS:</b> No	<b>TWS Privilege:</b> No  <b>Role:</b> NONE <b>Token Type:</b> N/A <small>Entity Remap function moved to User Mgmt page</small>
<a href="#">Personal Information for Vladimir Maslyakov (Employee)</a>		<a href="#">hide</a>
<a href="#">US-ASCII Fields</a>		
<b>Name:</b> Vladimir Maslyakov <b>Entity ID:</b> [REDACTED]3956	<b>City of Birth:</b> Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	<b>Email:</b> vm@ghcg.com <b>Residential Address:</b>  <b>Mailing Address:</b>  <b>Occupation:</b>
<b>Name:</b> Vladimir Maslyakov <b>Entity ID:</b> [REDACTED]3956	<b>Native Language Fields (Language code: en)</b>  <b>City of Birth:</b> Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	<b>Email:</b> vm@ghcg.com <b>Residential Address:</b>  <b>Mailing Address:</b>  <b>Occupation:</b>
<a href="#">Change Info</a>   <a href="#">Mark as PEP</a>   <a href="#">Ownership History*</a>		
<a href="#">Sessions:</a>		
<b>User:</b> vlad1531 [REDACTED]1444)	<b>Active in TWS:</b> No	<b>TWS Privilege:</b> No  <b>Role:</b> NONE <b>Token Type:</b> N/A <small>Entity Remap function moved to User Mgmt page</small>
<a href="#">Personal Information for Andrey Okhlopkov (TRADER,Employee)</a>		<a href="#">hide</a>
<a href="#">US-ASCII Fields</a>		

Personal Information for Andrey Okhlopkov (TRADER, Employee)		US-ASCII Fields	
<b>Name:</b> Andrey Okhlopkov <b>Entity ID:</b> 3181	<b>City of Birth:</b> Drivers Lic #: [REDACTED] Alien ID: Passport: National ID: has Greencard: false	<b>Email:</b> oh@ghcg.com <b>Residential Address:</b> <b>Mailing Address:</b>	<b>Occupation:</b>  <b>Native Language Fields (Language code: en)</b> City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false
<b>Change Info ▾</b>	<b>Request Proof of ID and DOB ▾</b>	<b>Request Proof of Address ▾</b>	<b>Mark as PEP ▾</b>
<b>Sessions:</b> User: fixtr377 [REDACTED] 4444)		<b>Active in TWS:</b> Yes	<b>Role:</b> CUSTOM <b>Token Type:</b> N/A <b>Ownership History ▾</b>
Personal Information for Vladimir Maslyakov (Employee)			
US-ASCII Fields		US-ASCII Fields	
<b>Name:</b> Vladimir Maslyakov <b>Entity ID:</b> 5084	<b>City of Birth:</b> Drivers Lic #: [REDACTED] Alien ID: Passport: National ID: has Greencard: false	<b>Email:</b> vm@ghcg.com <b>Residential Address:</b> <b>Mailing Address:</b>	<b>Occupation:</b>  <b>Native Language Fields (Language code: en)</b> City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false
<b>Change Info ▾</b>	<b>Mark as PEP ▾</b>	<b>Ownership History ▾</b>	<b>Occupation:</b>  <b>Native Language Fields (Language code: en)</b> City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false
<b>Sessions:</b> User: viad19 [REDACTED] 4444)		<b>Active in TWS:</b> No	<b>TWS Privilege:</b> No <b>Role:</b> CUSTOM <b>Token Type:</b> N/A <b>Entity Remap function moved to User Mgmt page</b>

Sessions:	<p>User: vlad [REDACTED] 444) Active in TWS: No TWS Privilege: No Role: CUSTOM Token Type: N/A Entity Remap function moved to User Mgmt page</p>
	Personal Information for Anatolii Knyazev (TRADER, Employee)



## **EXHIBIT 98**

TERRITORY OF THE BRITISH VIRGIN ISLANDS  
BVI BUSINESS COMPANIES ACT, 2004

John D. Carruthers  
Registered Agent

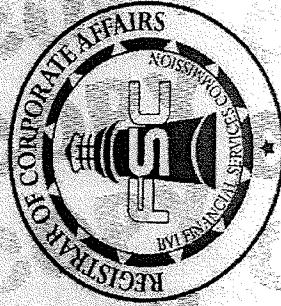
CERTIFICATE OF INCORPORATION  
(SECTION 7)

The REGISTRAR of CORPORATE AFFAIRS, of the British Virgin Islands HEREBY CERTIFIES, that pursuant to the BVI Business Companies Act, 2004, all the requirements of the Act in respect of incorporation having been complied with,

Memeland Investments Ltd

BVI COMPANY NUMBER: 1673928

is incorporated in the BRITISH VIRGIN ISLANDS as a BVI BUSINESS COMPANY, this 3rd day of October, 2011.



Michael J. F. Smith  
for REGISTRAR OF CORPORATE AFFAIRS  
3rd day of October, 2011

## **EXHIBIT 99**

## SUMMARY INFORMATION FOR MEMELLAND INVESTMENTS LTD

### CUSTOMER SUMMARY FOR MEMELLAND INVESTMENTS LTD

Title:	Memelland Investments Ltd				
Applicant ID:	1842015				
Type:	ORG - Separate Trading Limit (Service Account) Master: U1104300				
Legal Country:	British Virgin Islands				
Mailing Address:	2, Christaki Ikar Epinikis Ktima, Flat 8, Summer Gardens, Limassol, , 4046, Cyprus				
E-mail Address:	memelland.investments@gmail.com				
Primary user name:	dmitri985				
Employer:	Set/Unset Employer				
Good-faith Review:					
<b>CAFII - Risk Ranking 3 Disciplinary/ Public Information Ranking - A</b>					
RELATIONSHIP TO OTHER JURISDICTION THAT MAY POSE INCREASED FRAUD RISK - SIGNATORY TRADER CEO OWNER					
RELATIONSHIP TO Non FATF COUNTRY - Applicant (Legal Residence/Mailing Address) PRIMARY CONTRIBUTOR					

### ACCOUNTS OF MEMELLAND INVESTMENTS LTD

ID	V/N	Type	Activated Capabilities	Status	Priority	Equity yesterday
4300	4300	Separate Trading Limit	BOND CFD FOP FUT LEVFX OPT STK MRGN PMRGN	Open.	NOT SET	2,025 USD
4300F	1300F	Separate Trading Limit	CFD FOP FUT OPT MRGN	Open.	NOT SET	0 USD
2799	2799	Separate Trading Limit	<b>BOND CFD FOP FUT LEVFX OPT STK MRGN PMRGN</b>	Open.	NOT SET	<b>743,707 USD</b>
2799F	1799F	Separate Trading Limit	CFD FOP FUT OPT MRGN	Open.	NOT SET	0 USD

### ACCOUNT SUMMARY FOR U1232799

U1232799

ID:	2799 (VAN: B2799)	Equity yesterday: 743,707 USD
Type:	Separate Trading Limit (Service Account)	Started: 19 Jul 2013
Activated Capabilities:	BOND CFD FOP FUT LEVFX OPT STK MRGN PMRGN	Approved:
Status:	Open. Clearing Status	Opened: 19 Jul 2013
Phylum	C - Customer	Funded: 19 Jul 2013
Priority	NOT SET Change Priority	Closed:
IB Entity:	IBLLC-US	Operator:
Currency:	USD	Estate:
ECA status:	Disabled	

TMS tickets TMS sticky notes Assign to ASG Account Diagnostic

[ACCOUNT APPROVAL DECISION](#)

CLICK to see Account Reopen History

**ACCOUNT APPROVAL DECISION**[CLICK to see Account Reopen History](#)

Decision: Accepted (Reopen)

## Proclamations:

I have reviewed the foregoing account application. Based upon the facts and circumstances presented including, but not limited to: the nature of the applicant's business and the markets it serves; the type of account for which the applicant has applied (i.e., cleared or execution-only, proprietary or customer, fully-disclosed or omnibus); the type, purpose and anticipated activity of the account; the nature and duration of IB's relationship with the applicant; publicly available information regarding the anti-money laundering and supervisory regime of the jurisdiction in which the applicant is located, formed and regulated and the jurisdiction where persons with a large ownership interest in the account are located; and the known disciplinary history of the applicant, this applicant is given a Risk Rating of:

3

Deciding User:  
Deciding Time:

## Additional Remarks:

**ACCOUNT CAPABILITIES**

Approved Capabilities	[BOND, CFD, FOR, FUT, LEVFX, MRGN, MULT, OPT, PMRGN, SSF, STK]
Activated Capabilities	[BOND, CFD, FOR, FUT, LEVFX, OPT, STK, MRGN, PMRGN]

**ACCOUNT UPGRADE DECISIONS**

No Upgrade Decisions yet

**ADDITIONAL APPLICANT/REGISTRATION INFORMATION****APPLICANT INFO**

Applicant ID: 1842015  
US Tax ID: N/A  
Country of Legal residence: British Virgin Islands  
Applicant Citizenship: British Virgin Islands  
State of Legal residence: N/A  
Market Data Status: Professional

Currency/Rate: USD / 1.0  
Marketing/Sales Info:  
N/A  
Use Trader IDs: Disabled

[Change Applicant Information](#)**INVESTMENT EXPERIENCE**

	Years of Experience	# of Trades per Year	Knowledge Level
Stocks	4	> 100	Extensive
Options	3	51 - 100	Extensive
Commodities	3	51 - 100	Extensive
Bond	4	26 - 50	Extensive
FX	6 - 10	> 100	Extensive
CFD	N/A	N/A	0

Bond	4	26 - 50	Extensive
FX	6 - 10	> 100	Extensive
CFD	N/A	N/A	0

**FINANCIAL INFORMATION**

Estimated Net Worth	100,001 - 250,000	Estimated Liquid Net Worth	100,001 - 250,000
Net Income	0 - 39,999	Sources of Funds (Other than regular income)	personal savings, long term loan
Total Assets	100,001	Accredited Investor for Private Placement?	No
		Invited to Private Placement?	No

**INVESTMENT OBJECTIVES**

Growth, Trading, Speculation, Hedging  
[Edit Objective](#)

**DISCIPLINARY EVENTS****QUESTION**

Has the organization or any of its officers or authorized traders ever been the subject of, or initiated, litigation, arbitration or any other type of dispute or settlement procedure with another broker or dealer?

Has the organization or any of its officers or authorized traders ever been the subject of an investigation or proceeding by any commodities or securities exchange or regulatory authority or self-regulatory authority?

Have any of the principals, officers or authorized traders of the Organization ever been arrested for, or convicted of, a No N/A crime?

**COMPLIANCE /REGULATORY INFORMATION**

Is the account holder or any immediate family member who resides in the same household, registered as a broker-dealer or an employee, No director or owner of a securities or commodities brokerage firm?	<a href="#">Add Broker-Dealer Affiliation»</a>
---	--

**QUESTION**

Is the Organization engaged in the **Brokerage business**? (e.g., is the Organization registered, authorized or operating as a futures commission merchant, or securities or futures brokerage firm in the US, UK, Canada or elsewhere) If Yes, No provide details

Is the organization required to be registered in the US, pursuant to NFA By-Law 1101, with the Commodities Futures Trading Commission, or in Canada with the IDA, or in any other country, as a futures commission merchant, introducing broker, commodity pool operator, commodity trading advisor, retail foreign exchange dealer or leverage transaction merchant? No N/A

\* **NFA By-Law 1101 Statement:** This is a personal/family investment vehicle (exempt from registration and no need to apply for exemption under NFA Guidance)

Is the organization a member of an exchange or an associated person, affiliated person or employee of an exchange No N/A member?

Is the account holder a member of a regulatory or a self-regulatory organization? No N/A

Is the account holder or any of its officers: i) a director, ii) a 10% shareholder, or iii) a policy-making officer of any No N/A publicly traded company? If Yes, enter stock symbols of companies:

Does the organization control the trading in, or have an ownership interest in, any other **Interactive Brokers** accounts? No N/A

Is the organization operating under a banking license issued by an OFAC or ML Risk Country? No no

Is the organization operating under an offshore banking license? N/A N/A

Is the organization the branch of a foreign bank found or chartered in one of the listed countries?

[Accepted Futures Arbitration Agreement?](#)

Is the organization operating under an offshore banking license?	N/A
Is the organization the branch of a foreign bank found or chartered in one of the listed countries?	no
Accepted Futures Arbitration Agreement?	Yes

[Edit Compliance Information](#) [Change Arbitration Agreement](#)

## APPLICANT ASSOCIATED ENTITIES

Show all»

Personal Information for Dmitrij Pruglo (SIGNATORY, TRADER, OWNER)

### US-ASCII Fields

Name:	Dmitrij Pruglo
Entity ID:	15114389
Opened Account ?	Yes
Ownership Percentage:	100.0
Citizenship:	Lithuania
DOB:	■■■■■ 1985
City of Birth:	
Drivers Lic #:	
Alien ID:	
Passport:	■■■■■668(Lithuania)
National ID:	
has Greencard:	false

Name:	Dmitrij Pruglo
Entity ID:	15114389
Opened Account ?	Yes
Ownership Percentage:	100.0
Citizenship:	Lithuania
DOB:	■■■■■ 1985
City of Birth:	
Drivers Lic #:	
Alien ID:	
Passport:	■■■■■668(Lithuania)
National ID:	
has Greencard:	false

[Change Info](#) [Request Proof of ID and DOB](#) [Request Proof of Address](#) [Mark as PEP](#) [Ownership History](#)

Sessions:

User: ■■■■■ 985 (■■■■■ 300F)

Active in TWS: Yes

Role: OWNER

Token Type: Bingo

Entity Remap function moved to User Mgmt page

Personal Information for Dmitrij Pruglo (CEO)

### US-ASCII Fields

Name:	Dmitrij Pruglo
Entity ID:	1511418
Opened Account ?	Yes
Ownership Percentage:	100.0
Citizenship:	Lithuania
DOB:	■■■■■ 1985
City of Birth:	
Drivers Lic #:	
Alien ID:	
Passport:	■■■■■668(Lithuania)
National ID:	
has Greencard:	false

Name:	Dmitrij Pruglo
Entity ID:	1511418
Opened Account ?	Yes
Ownership Percentage:	100.0
Citizenship:	Lithuania
DOB:	■■■■■ 1985
City of Birth:	
Drivers Lic #:	
Alien ID:	
Passport:	■■■■■668(Lithuania)
National ID:	
has Greencard:	false

Name:	Dmitrij Pruglo
Entity ID:	1511418
Opened Account ?	Yes
Ownership Percentage:	100.0
Citizenship:	Lithuania
DOB:	■■■■■ 1985
City of Birth:	
Drivers Lic #:	
Alien ID:	
Passport:	■■■■■668(Lithuania)
National ID:	
has Greencard:	false

National ID: has Greencard: false	Change Info » Request Proof of ID and DOB »	Request Proof of Address »	Mark as PEP »	Mark as PEP »	Ownership History »
Cyprus Mailing Address: Same as residential address Occupation:					
Name:Dmitrij Pruglo Entity ID: 15114494	Personal Information for Dmitrij Pruglo (PRIMARY CONTRIBUTOR)	US-ASCII Fields	show »		
City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Occupation: economist  Employer: Memeland Investments Employer Business: Employer Address: Waterfront drive, Jordans Office at Geneva place Tortola, 3469 British Virgin Islands				
Residential Address:					
Mailing Address: Same as residential address					
Name:Dmitrij Pruglo Entity ID: 15114494	Native Language Fields (Language code: en)	US-ASCII Fields	show »		
City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Occupation: economist  Employer: Memeland Investments Employer Business: Employer Address: Waterfront drive, Jordans Office at Geneva place Tortola, 3469 British Virgin Islands				
Residential Address:					
Mailing Address: Same as residential address					
Name:Dmitrij Pruglo Entity ID: 18138734	Personal Information for Dmitrij Pruglo (TRADER)	US-ASCII Fields	show »		
Citizenship: DOB: City of Birth: Drivers Lic #: Alien ID: Passport: National ID: has Greencard: false	Email: memeland.investments@gmail.com Home Phone: + [REDACTED] 3228  Residential Address: Iras 2 street Limassol,4532 Cyprus Mailing Address:				
Residential Address:					
Mailing Address:					
National ID: has Greencard: false	Occupation:				
User: [REDACTED] 1985 [REDACTED] 32799	Active in TWS: yes	Request Proof of Address »	Mark as PEP »	Role: TRADER	Ownership History »
Sessions:					
					Token Type: N/A
					Entity Remap function moved to User

<b>Sessions:</b>	User: [REDACTED] 1985 ([REDACTED] '99)	Active in TWS: Yes	Role: TRADER	Token Type: N/A
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[REDACTED]

Customer Account Supervision System - Interactive Brokers